EXHIBIT 13

SEIFMAN, P.C., ET AL v. GUZALL, III, ET AL ANDREA MCANALLY

October 17, 2012

Prepared for you by



Bingham Farms/Southfield • Grand Rapids

Ann Arbor • Detroit • Flint • Jackson • Lansing • Mt. Clemens • Saginaw

	0.0				
		Page	1		. Page 3
		STATE OF MICHIGAN		1	TABLE OF CONTENTS
•	1	2 IN THE CIRCUIT COURT FOR THE COUNTY OF OAKLA	NID.	-2	
	1	2 IN THE CIRCUIT COURT FOR THE COUNTY OF GARDA	110	3	
	1			-4	ANDREA McANALLY
	1 5		1	5	ANDREA MICANALLI
	1.		.	б	EXAMINATION
	7		l	7	BY MR. CAMARGO:5
	1	,	1	8	EXAMINATION
	8			9	BY MR. WARREN: 89
	1			10	EXAMINATION
	10			11	BY MR. CAMARGO:
	11		- 1	12	EXAMINATION
	12		- 1	1.3	BY MR. WARREN: 94
1	13			13 14	DI MR. WARKEN 97
j	14		3	15	EXHIBITS
	15	Corporation, jointly and severally,		15 16	EXHIBIT Page
\cdot	16	Defendants.		10 17	(Exhibits Attached to Transcript.)
	17 18			17 18	(EVIUDE VITALIER TO HOUSE THE
	19	The Deposition of ANDREA McANALLY,	- 7	10 19	DEPOSITION EXHIBIT 1
	20	Taken at 30665 Northwestern Highway, Suite 200,	- 1	20	DEPOSITION EXHIBIT 2
ı	21	Farmington Hilfs, Michigan,		21	DEPOSITION EXHIBIT 3
	22	Commencing at 1:11 p.m.,	- 1 -	22	DEPOSITION EXHIBIT 4
	23		1	23	DEPOSITION EXHIBIT 5
	24	Before Joanne Smith, CSR-3099.		24	DEPOSITION EXHIBIT 6
	25	•	- 1	25	DEPOSITION EXHIBIT 7
-			╁	-	
		Page 2	٠		Page 4
	1	APPEARANCES:		1	DEPOSITION EXHIBIT 8
	2	DAVID W. WARREN		2	DEPOSITION EXHIBIT 9 39
1	3	Joelson Rosenberg Moss Cohen Warren & Drasnin, PLC	f	3	DEPOSITION EXHIBIT 10
	4	30665 Northwestern Highway, Suite 200		4	DEPOSITION EXHIBIT 11
	5	Farmington Hills, Michigan 48334	f	5	
	6	248.855.2233	1	6	
	7.	Appearing on behalf of the Plaintiffs/	1	7	
	8	Counter-Defendants.		8 .	
	9			9	-
1	0	NICOLAS CAMARGO] 1(13 mg/s
ŀ	1	Fedor Camargo & Weston, PLC	1:		in in the state of
1	2	401 S. Old Woodward Avenue, Suite 410	12		121 1 183
1		Birmingham, Michigan 48009	13		11.50
1	4	248.822.7160	14		ntivon 1
1	5	Appearing on behalf of the Defendants/	15		
1	6	Counter-Plaintiffs.	16		E1 (14)
1	7		17		H. H
1	8	RAYMOND GUZALL, III	18		THE THE PARTY OF T
1		Law Offices of Raymond Guzail III, PC	19		100 100 100 100 100 100 100 100 100 100
2(Ċ	31555 W. Fourteen Mile Road, Suite 320	20		
2.	L	Farmington Hills, Michigan 48334	21		1950年
22		248.702.6122	22		1100 H
2	3 .		23		the state of the s
2.4		990.1101 (101111110)	24		
2.		<u> </u>	25		

Page	5 Page
,	1 Q. What was that capacity?
, -	2 A. Mayor.
,,	
3 1:11 p.m.	at any job sales that the tracking of the trac
1	, , , , , , , , , , , , , , , , , , , ,
6 was thereupon called as a witness herein, and after	1
having first been duly sworn to testify to the truth,	the state of the s
8 the whole truth and nothing but the truth, was	8 of those six years. Do you remember approximately
9 examined and testified as follows:	9 when those six years were?
10 EXAMINATION	10 A. No. I wasn't in the state for much of it.
11 BY MR. CAMARGO:	. 11 Q. Where were you living?
12 Q. Would you please state your name for the record?	12 A. California.
13 A. Andrea McAnally.	1.3 Q. Whereabouts?
14 Q. Miss McAnally, are you currently employed?	14 A. Los Angeles for a while and Orange County for a while
15 A. Iam.	1.5 Q. Okay. We talked very briefly about your duties and
16 Q. Where are you employed?	16 you kind of said you do whatever you're asked. Do you
17 A. Law Offices of Barry A. Seifman.	17 have any specific duties that you do there?
18 Q. How long have you been there?	18 A. I manage the firm checking account, I order supplies
19 A. Eleven years.	19 I share responsibilities for the phones. I
20 Q. What's your current position?	20 transcribe.
21 A. Legal assistant, office manager.	21 Q. When you say type, transcribe
22 Q. You do a little bit of everything there?	22 A. Dictation.
23 A. What I'm told.	23 Q. Pleadings, dictation, letters, et cetera?
Q. Okay. How long have you known Barry Seifman?	24 A. Yes. E-filings.
25 A. For maybe 15 years. He knows my mother.	25 Q. You weren't kidding when you said a little bit of
Page 6	1
	Page 8
1 Q. Okay. And is that how you came to know him?	1 everything; right?
1 Q. Okay. And is that how you came to know him? 2 A. Yes.	1 everything; right? 2 A. Pretty much.
 Q. Okay. And is that how you came to know him? A. Yes. Q. How did you come to — Well, let me ask you this 	everything; right? A. Pretty much. Q. When you say that you do the phones, is that answering
Q. Okay. And is that how you came to know him? A. Yes. Q. How did you come to — Well, let me ask you this first: How long have you been employed with Mr.	everything; right? A. Pretty much. When you say that you do the phones, is that answering the phones?
1 Q. Okay. And is that how you came to know him? 2 A. Yes. 3 Q. How did you come to — Well, let me ask you this 4 first: How long have you been employed with Mr. 5 Seifman's firm?	1 everything; right? 2 A. Pretty much. 3 Q. When you say that you do the phones, is that answering the phones? 5 A. Yes.
1 Q. Okay. And is that how you came to know him? 2 A. Yes. 3 Q. How did you come to — Well, let me ask you this 4 first: How long have you been employed with Mr. 5 Seifman's firm? 6 A. Eleven years.	1 everything; right? 2 A. Pretty much. 3 Q. When you say that you do the phones, is that answering the phones? 5 A. Yes. 6 Q. Do you also have contact with clients regarding any
Q. Okay. And is that how you came to know him? A. Yes. Q. How did you come to — Well, let me ask you this first: How long have you been employed with Mr. Seifman's firm? A. Eleven years.	1 everything; right? 2 A. Pretty much. 3 Q. When you say that you do the phones, is that answering the phones? 5 A. Yes.
1 Q. Okay. And is that how you came to know him? 2 A. Yes. 3 Q. How did you come to — Well, let me ask you this 4 first: How long have you been employed with Mr. 5 Seifman's firm? 6 A. Eleven years. 7 Q. How did you come to become employed with the firm?	everything; right? A. Pretty much. Q. When you say that you do the phones, is that answering the phones? A. Yes. O. Do.you also have contact with clients regarding any questions they may have? A. Sometimes, but I defer to Mr. Seifman.
1 Q. Okay. And is that how you came to know him? 2 A. Yes. 3 Q. How did you come to — Well, let me ask you this 4 first: How long have you been employed with Mr. 5 Seifman's firm? 6 A. Eleven years. 7 Q. How did you come to become employed with the firm? 8 A. I was working at a firm, then gave my notice, and he	1 everything; right? 2 A. Pretty much. 3 Q. When you say that you do the phones, is that answering the phones? 5 A. Yes. 6 Q. Do you also have contact with clients regarding any questions they may have?
1 Q. Okay. And is that how you came to know him? 2 A. Yes. 3 Q. How did you come to — Well, let me ask you this 4 first: How long have you been employed with Mr. 5 Seifman's firm? 6 A. Eleven years. 7 Q. How did you come to become employed with the firm? 8 A. I was working at a firm, then gave my notice, and he 9 was looking for somebody and I interviewed and got the	everything; right? A. Pretty much. Q. When you say that you do the phones, is that answering the phones? A. Yes. Q. Do.you also have contact with clients regarding any questions they may have? A. Sometimes, but I defer to Mr. Seifman.
Q. Okay. And is that how you came to know him? A. Yes. Q. How did you come to — Well, let me ask you this first: How long have you been employed with Mr. Seifman's firm? A. Eleven years. Q. How did you come to become employed with the firm? A. I was working at a firm, then gave my notice, and he was looking for somebody and I interviewed and got the job.	everything; right? A. Pretty much. When you say that you do the phones, is that answering the phones? A. Yes. Do.you also have contact with clients regarding any questions they may have? A. Sometimes, but I defer to Mr. Seifman. How about with respect to supplies? I know you said
Q. Okay. And is that how you came to know him? A. Yes. Q. How did you come to — Well, let me ask you this first: How long have you been employed with Mr. Seifman's firm? A. Eleven years. Q. How did you come to become employed with the firm? A. I was working at a firm, then gave my notice, and he was looking for somebody and I interviewed and got the job. Q. Did you give your notice with the understanding that	everything; right? A. Pretty much. Q. When you say that you do the phones, is that answering the phones? A. Yes. Q. Do.you also have contact with clients regarding any questions they may have? A. Sometimes, but I defer to Mr. Seifman. Q. How about with respect to supplies? I know you said you manage the supplies. What does that entail?
Q. Okay. And is that how you came to know him? A. Yes. Q. How did you come to — Well, let me ask you this first: How long have you been employed with Mr. Seifman's firm? A. Eleven years. Q. How did you come to become employed with the firm? A. I was working at a firm, then gave my notice, and he was looking for somebody and I interviewed and got the job. Q. Did you give your notice with the understanding that you were going to take the position with Mr. Seifman	1 everything; right? 2 A. Pretty much. 3 Q. When you say that you do the phones, is that answering the phones? 5 A. Yes. 6 Q. Do you also have contact with clients regarding any questions they may have? 8 A. Sometimes, but I defer to Mr. Seifman. 9 Q. How about with respect to supplies? I know you said you manage the supplies. What does that entail? 11 A. Well, paper, office supplies. Paper clips, staples,
Q. Okay. And is that how you came to know him? A. Yes. Q. How did you come to — Well, let me ask you this first: How long have you been employed with Mr. Seifman's firm? A. Eleven years. Q. How did you come to become employed with the firm? A. I was working at a firm, then gave my notice, and he was looking for somebody and I interviewed and got the job. Q. Did you give your notice with the understanding that you were going to take the position with Mr. Seifman or had you already given your notice and this just	everything; right? A. Pretty much. Q. When you say that you do the phones, is that answering the phones? A. Yes. Q. Do you also have contact with clients regarding any questions they may have? A. Sometimes, but I defer to Mr. Seifman. Q. How about with respect to supplies? I know you said you manage the supplies. What does that entail? A. Well, paper, office supplies. Paper clips, staples, the like. Q. And so that I understand, your firm or Mr. Seifman's
Q. Okay. And is that how you came to know him? A. Yes. Q. How did you come to — Well, let me ask you this first: How long have you been employed with Mr. Seifman's firm? A. Eleven years. Q. How did you come to become employed with the firm? A. I was working at a firm, then gave my notice, and he was looking for somebody and I interviewed and got the job. Q. Did you give your notice with the understanding that you were going to take the position with Mr. Seifman or had you already given your notice and this just came up?	everything; right? A. Pretty much. Q. When you say that you do the phones, is that answering the phones? A. Yes. Q. Do you also have contact with clients regarding any questions they may have? A. Sometimes, but I defer to Mr. Seifman. Q. How about with respect to supplies? I know you said you manage the supplies. What does that entail? A. Well, paper, office supplies. Paper clips, staples, the like. Q. And so that I understand, your firm or Mr. Seifman's
Q. Okay. And is that how you came to know him? A. Yes. Q. How did you come to — Well, let me ask you this first: How long have you been employed with Mr. Selfman's firm? A. Eleven years. Q. How did you come to become employed with the firm? A. I was working at a firm, then gave my notice, and he was looking for somebody and I interviewed and got the job. Q. Did you give your notice with the understanding that you were going to take the position with Mr. Selfman or had you already given your notice and this just came up? A. I have to think how that happened. I didn't give my	everything; right? A. Pretty much. Q. When you say that you do the phones, is that answering the phones? A. Yes. Q. Do you also have contact with clients regarding any questions they may have? A. Sometimes, but I defer to Mr. Seifman. Q. How about with respect to supplies? I know you said you manage the supplies. What does that entail? A. Well, paper, office supplies. Paper clips, staples, the like. Q. And so that I understand, your firm or Mr. Seifman's firm, I should say, the firm that you work at, it's
Q. Okay. And is that how you came to know him? A. Yes. Q. How did you come to — Well, let me ask you this first: How long have you been employed with Mr. Seifman's firm? A. Eleven years. Q. How did you come to become employed with the firm? A. I was working at a firm, then gave my notice, and he was looking for somebody and I interviewed and got the job. Q. Did you give your notice with the understanding that you were going to take the position with Mr. Seifman or had you already given your notice and this just came up? A. I have to think how that happened. I didn't give my notice until I had secured the position with Mr.	1 everything; right? 2 A. Pretty much. 3 Q. When you say that you do the phones, is that answering the phones? 5 A. Yes. 6 Q. Do.you also have contact with clients regarding any questions they may have? 8 A. Sometimes, but I defer to Mr. Seifman. 9 Q. How about with respect to supplies? I know you said you manage the supplies. What does that entail? 11 A. Well, paper, office supplies. Paper clips, staples, the like. 13 Q. And so that I understand, your firm or Mr. Seifman's firm, I should say, the firm that you work at, it's actually in this building; is that right? 16 A. Yes.
Q. Okay. And is that how you came to know him? A. Yes. Q. How did you come to — Well, let me ask you this first: How long have you been employed with Mr. Seifman's firm? A. Eleven years. Q. How did you come to become employed with the firm? A. I was working at a firm, then gave my notice, and he was looking for somebody and I interviewed and got the job. Q. Did you give your notice with the understanding that you were going to take the position with Mr. Seifman or had you already given your notice and this just came up? A. I have to think how that happened. I didn't give my notice until I had secured the position with Mr. Seifman.	1 everything; right? 2 A. Pretty much. 3 Q. When you say that you do the phones, is that answering the phones? 5 A. Yes. 6 Q. Do you also have contact with clients regarding any questions they may have? 8 A. Sometimes, but I defer to Mr. Seifman. 9 Q. How about with respect to supplies? I know you said you manage the supplies. What does that entail? 11 A. Well, paper, office supplies. Paper clips, staples, the like. 13 Q. And so that I understand, your firm or Mr. Seifman's firm, I should say, the firm that you work at, it's actually in this building; is that right? 16 A. Yes. 17 Q. The actual address is?
Q. Okay. And is that how you came to know him? A. Yes. Q. How did you come to — Well, let me ask you this first: How long have you been employed with Mr. Seifman's firm? A. Eleven years. Q. How did you come to become employed with the firm? A. I was working at a firm, then gave my notice, and he was looking for somebody and I interviewed and got the job. Q. Did you give your notice with the understanding that you were going to take the position with Mr. Seifman or had you already given your notice and this just came up? A. I have to think how that happened. I didn't give my notice until I had secured the position with Mr. Seifman. Q. And you said that you were introduced to him by way of	1 everything; right? 2 A. Pretty much. 3 Q. When you say that you do the phones, is that answering the phones? 5 A. Yes. 6 Q. Do.you also have contact with clients regarding any questions they may have? 8 A. Sometimes, but I defer to Mr. Seifman. 9 Q. How about with respect to supplies? I know you said you manage the supplies. What does that entail? 11 A. Well, paper, office supplies. Paper clips, staples, the like. 13 Q. And so that I understand, your firm or Mr. Seifman's firm, I should say, the firm that you work at, it's actually in this building; is that right? 14 Yes. 15 Q. The actual address is? 16 A. Suite 255, 30665 Northwestern Highway.
Q. Okay. And is that how you came to know him? A. Yes. Q. How did you come to — Well, let me ask you this first: How long have you been employed with Mr. Seifman's firm? A. Eleven years. Q. How did you come to become employed with the firm? A. I was working at a firm, then gave my notice, and he was looking for somebody and I interviewed and got the job. Q. Did you give your notice with the understanding that you were going to take the position with Mr. Seifman or had you already given your notice and this just came up? A. I have to think how that happened. I didn't give my notice until I had secured the position with Mr. Seifman. Q. And you said that you were introduced to him by way of your mother; is that correct?	1 everything; right? 2 A. Pretty much. 3 Q. When you say that you do the phones, is that answering the phones? 5 A. Yes. 6 Q. Do.you also have contact with clients regarding any questions they may have? 8 A. Sometimes, but I defer to Mr. Seifman. 9 Q. How about with respect to supplies? I know you said you manage the supplies. What does that entail? 11 A. Well, paper, office supplies. Paper clips, staples, the like. 13 Q. And so that I understand, your firm or Mr. Seifman's firm, I should say, the firm that you work at, it's actually in this building; is that right? 14 Yes. 15 Q. The actual address is? 16 A. Yes. 17 Q. Great. And in that office, is it solely Mr. Seifman
Q. Okay. And is that how you came to know him? A. Yes. Q. How did you come to — Well, let me ask you this first: How long have you been employed with Mr. Seifman's firm? A. Eleven years. Q. How did you come to become employed with the firm? A. I was working at a firm, then gave my notice, and he was looking for somebody and I interviewed and got the job. Q. Did you give your notice with the understanding that you were going to take the position with Mr. Seifman or had you already given your notice and this just came up? A. I have to think how that happened. I didn't give my notice until I had secured the position with Mr. Seifman. Q. And you said that you were introduced to him by way of your mother; is that correct? A. That's correct.	1 everything; right? 2 A. Pretty much. 3 Q. When you say that you do the phones, is that answering the phones? 5 A. Yes. 6 Q. Do you also have contact with clients regarding any questions they may have? 8 A. Sometimes, but I defer to Mr. Seifman. 9 Q. How about with respect to supplies? I know you said you manage the supplies. What does that entail? 11 A. Welf, paper, office supplies. Paper clips, staples, the like. 13 Q. And so that I understand, your firm or Mr. Seifman's firm, I should say, the firm that you work at, it's actually in this building; is that right? 14 A. Yes. 17 Q. The actual address is? 18 A. Suite 255, 30665 Northwestern Highway. 19 Q. Great. And In that office, is it solely Mr. Seifman and people associated with his firm that occupy the
Q. Okay. And is that how you came to know him? A. Yes. Q. How did you come to — Well, let me ask you this first: How long have you been employed with Mr. Seifman's firm? A. Eleven years. Q. How did you come to become employed with the firm? A. I was working at a firm, then gave my notice, and he was looking for somebody and I interviewed and got the job. Q. Did you give your notice with the understanding that you were going to take the position with Mr. Seifman or had you already given your notice and this just came up? A. I have to think how that happened. I didn't give my notice until I had secured the position with Mr. Seifman. Q. And you said that you were introduced to him by way of your mother; is that correct? A. That's correct. Q. Your mother's name is?	1 everything; right? 2 A. Pretty much. 3 Q. When you say that you do the phones, is that answering the phones? 5 A. Yes. 6 Q. Do. you also have contact with clients regarding any questions they may have? 8 A. Sometimes, but I defer to Mr. Seifman. 9 Q. How about with respect to supplies? I know you said you manage the supplies. What does that entail? 11 A. Well, paper, office supplies. Paper clips, staples, the like. 13 Q. And so that I understand, your firm or Mr. Seifman's firm, I should say, the firm that you work at, it's actually in this building; is that right? 14 A. Yes. 15 A. Yes. 16 Q. The actual address is? 17 Q. The actual address is? 18 A. Suite 255, 30665 Northwestern Highway. 19 Q. Great. And In that office, is it solely Mr. Seifman and people associated with his firm that occupy the office?
Q. Okay. And is that how you came to know him? A. Yes. Q. How did you come to — Well, let me ask you this first: How long have you been employed with Mr. Seifman's firm? A. Eleven years. Q. How did you come to become employed with the firm? A. I was working at a firm, then gave my notice, and he was looking for somebody and I interviewed and got the job. Q. Did you give your notice with the understanding that you were going to take the position with Mr. Seifman or had you already given your notice and this just came up? A. I have to think how that happened. I didn't give my notice until I had secured the position with Mr. Seifman. Q. And you said that you were introduced to him by way of your mother; is that correct? A. That's correct. Q. Your mother's name is? A. Beverly McAnally.	everything; right? A. Pretty much. Q. When you say that you do the phones, is that answering the phones? A. Yes. Q. Do. you also have contact with clients regarding any questions they may have? A. Sometimes, but I defer to Mr. Seifman. Q. How about with respect to supplies? I know you said you manage the supplies. What does that entail? A. Well, paper, office supplies. Paper clips, staples, the like. Q. And so that I understand, your firm or Mr. Seifman's firm, I should say, the firm that you work at, it's actually in this building; is that right? A. Yes. Q. The actual address is? A. Suite 255, 30665 Northwestern Highway. Q. Great. And In that office, is it solely Mr. Seifman and people associated with his firm that occupy the office? A. Yes.
Q. Okay. And is that how you came to know him? A. Yes. Q. How did you come to — Well, let me ask you this first: How long have you been employed with Mr. Seifman's firm? A. Eleven years. Q. How did you come to become employed with the firm? A. I was working at a firm, then gave my notice, and he was laoking for somebody and I interviewed and got the job. Q. Did you give your notice with the understanding that you were going to take the position with Mr. Seifman or had you already given your notice and this just came up? A. I have to think how that happened. I didn't give my notice until I had secured the position with Mr. Seifman. Q. And you said that you were introduced to him by way of your mother; is that correct? A. That's correct. Q. Your mother's name is? A. Beverly McAnally. Q. She at the time was serving in an official capacity	everything; right? A. Pretty much. Q. When you say that you do the phones, is that answering the phones? A. Yes. Q. Do. you also have contact with clients regarding any questions they may have? A. Sometimes, but I defer to Mr. Seifman. Q. How about with respect to supplies? I know you said you manage the supplies. What does that entail? A. Well, paper, office supplies. Paper clips, staples, the like. Q. And so that I understand, your firm or Mr. Seifman's firm, I should say, the firm that you work at, it's actually in this building; is that right? A. Yes. Q. The actual address is? A. Suite 255, 30665 Northwestern Highway. Q. Great. And in that office, is it solely Mr. Seifman and people associated with his firm that occupy the office? A. Yes. Q. So — and the reason I say —
Q. Okay. And is that how you came to know him? A. Yes. Q. How did you come to — Well, let me ask you this first: How long have you been employed with Mr. Seifman's firm? A. Eleven years. Q. How did you come to become employed with the firm? A. I was working at a firm, then gave my notice, and he was looking for somebody and I interviewed and got the job. Q. Did you give your notice with the understanding that you were going to take the position with Mr. Seifman or had you already given your notice and this just came up? A. I have to think how that happened. I didn't give my notice until I had secured the position with Mr. Seifman. Q. And you said that you were introduced to him by way of your mother; is that correct? A. That's correct. Q. Your mother's name is? A. Beverly McAnally. Q. She at the time was serving in an official capacity for the City of Romulus; am I correct?	1 everything; right? 2 A. Pretty much. 3 Q. When you say that you do the phones, is that answering the phones? 5 A. Yes. 6 Q. Do. you also have contact with clients regarding any questions they may have? 8 A. Sometimes, but I defer to Mr. Seifman. 9 Q. How about with respect to supplies? I know you said you manage the supplies. What does that entail? 11 A. Well, paper, office supplies. Paper clips, staples, the like. 13 Q. And so that I understand, your firm or Mr. Seifman's firm, I should say, the firm that you work at, it's actually in this building; is that right? 14 A. Yes. 15 A. Suite 255, 30665 Northwestern Highway. 16 A. Suite 255, 30665 Northwestern Highway. 17 Q. Great. And In that office, is it solely Mr. Seifman and people associated with his firm that occupy the office? 18 A. Yes.

please scan in the exhibits for both of the deps and if you can e-mail them to me? MR. CAMARGO: I'll be happy to. We'll do that today. BY MR. CAMARGO: Prescriptions. Is that right? A. Yes. Can you describe that a little more? A. Yes. Can you describe that a little more? A. Well, he would just write prescription, RX is what he did, and write the amounts, but not specifics. A. Yes. A. Yes. A. Yes. A. Yes. Can you would enter that into QuickBooks? A. Yes. Can you would enter that into QuickBooks? A. Yes. Can you would enter that into QuickBooks? A. Yes. Can you would enter that into QuickBooks? A. Yes. Can you would enter that into QuickBooks? A. Yes. Can you would enter that into QuickBooks? Can you describe that a little more? Can you describe t	e-39
2 A. Yes. 3 MR. CAMARGO: I'll be happy to. We'll do 4 that today. 5 BY MR. CAMARGO: 6 Q. You said one of the things you saw, for example, was 7 prescriptions. Is that right? 7 MARKED FOR IDENTIFICATION: 8 A. Yes. 9 Q. Can you describe that a little more? 10 A. Well, he would just write prescription, RX is what he 11 did, and write the amounts, but not specifics. 12 Q. And then you would enter that into QuickBooks? 13 A. Yes. 14 Q. Under an expense or expenditure? 15 A. Under prescriptions. Personal. 16 Q. Prescriptions personal? 2 A. Yes. 3 MR. WARREN: Can we take a two-minute break? 6 (Off the record at 1:50 p.m.) 7 MARKED FOR IDENTIFICATION: 8 DEPOSITION EXHIBITS 1-11 9 1:53 p.m. 10 (Back on the record at 1:53 p.m.) 11 BY MR. CAMARGO: 12 Q. All right, ma'am. I am showing you what's been marked at a sexhibit 1. I'm giving you what's been marked at Exhibit 1. It's two separate documents. Do you recognize either of those documents? 16 A. No.	
MR. CAMARGO: I'll be happy to. We'll do that today. 5 BY MR. CAMARGO: 6 Q. You said one of the things you saw, for example, was 7 prescriptions. Is that right? 7 MARKED FOR IDENTIFICATION: 8 A. Yes. 9 Q. Can you describe that a little more? 10 A. Well, he would just write prescription, RX is what he 11 did, and write the amounts, but not specifics. 12 Q. And then you would enter that into QuickBooks? 13 A. Yes. 14 Q. Under an expense or expenditure? 15 A. Under prescriptions. Personal. 16 Q. Prescriptions personal? 18 MR. WARREN: Can we take a two-minute 4 break? MR. CAMARGO: Yes. 6 (Off the record at 1:50 p.m.) 7 MARKED FOR IDENTIFICATION: 8 DEPOSITION EXHIBITS 1-11 9 1:53 p.m. 10 (Back on the record at 1:53 p.m.) 11 BY MR. CAMARGO: 12 Q. All right, ma'am. I am showing you what's been marked at as Exhibit 1. I'm giving you what's been marked at Exhibit 1. It's two separate documents. Do you recognize either of those documents? 16 A. No.	
4 that today. 5 BY MR. CAMARGO: 6 Q. You said one of the things you saw, for example, was 7 prescriptions. Is that right? 7 MARKED FOR IDENTIFICATION: 8 A. Yes. 9 Q. Can you describe that a little more? 10 A. Well, he would just write prescription, RX is what he 11 did, and write the amounts, but not specifics. 12 Q. And then you would enter that into QuickBooks? 13 A. Yes. 14 Q. Under an expense or expenditure? 15 A. Under prescriptions. Personal. 16 Q. Prescriptions personal? 4 break? 5 MR. CAMARGO: Yes. 6 (Off the record at 1:50 p.m.) 7 MARKED FOR IDENTIFICATION: 8 DEPOSITION EXHIBITS 1-11 9 1:53 p.m. 10 (Back on the record at 1:53 p.m.) 11 BY MR. CAMARGO: 12 Q. All right, ma'am. I am showing you what's been marked at Exhibit 1. I'm giving you what's been marked at Exhibit 1. It's two separate documents. Do you recognize either of those documents? 16 A. No.	
5 BY MR. CAMARGO: 6 Q. You said one of the things you saw, for example, was 7 prescriptions. Is that right? 7 MARKED FOR IDENTIFICATION: 8 A. Yes. 9 Q. Can you describe that a little more? 10 A. Well, he would just write prescription, RX is what he 11 did, and write the amounts, but not specifics. 12 Q. And then you would enter that into QuickBooks? 13 A. Yes. 14 Q. Under an expense or expenditure? 15 A. Under prescriptions. Personal. 16 Q. Prescriptions personal? 5 MR. CAMARGO: Yes. 6 (Off the record at 1:50 p.m.) 7 MARKED FOR IDENTIFICATION: 8 DEPOSITION EXHIBITS 1-11 9 1:53 p.m. 10 (Back on the record at 1:53 p.m.) 11 BY MR. CAMARGO: 12 Q. All right, ma'am. I am showing you what's been marked at as Exhibit 1. I'm giving you what's been marked at Exhibit 1. It's two separate documents. Do you recognize either of those documents? 16 A. No.	
6 Q. You said one of the things you saw, for example, was prescriptions. Is that right? 7 prescriptions. Is that right? 8 A. Yes. 9 Q. Can you describe that a little more? 10 A. Well, he would just write prescription, RX is what he did, and write the amounts, but not specifics. 11 BY MR. CAMARGO: 12 Q. And then you would enter that into QuickBooks? 13 A. Yes. 14 Q. Under an expense or expenditure? 15 A. Under prescriptions. Personal. 16 Q. Prescriptions personal? 16 A. No.	.
7 MARKED FOR IDENTIFICATION: 8 A. Yes. 9 Q. Can you describe that a little more? 10 A. Well, he would just write prescription, RX is what he did, and write the amounts, but not specifics. 12 Q. And then you would enter that into QuickBooks? 13 A. Yes. 14 Q. Under an expense or expenditure? 15 A. Under prescriptions, Personal. 16 Q. Prescriptions personal? 7 MARKED FOR IDENTIFICATION: 8 DEPOSITION EXHIBITS 1-11 9 1:53 p.m. 10 (Back on the record at 1:53 p.m.) 11 BY MR. CAMARGO: 12 Q. All right, ma'am. I am showing you what's been marked at Exhibit 1. I'm giving you what's been marked at Exhibit 1. It's two separate documents. Do you 15 recognize either of those documents? 16 A. No.	
8 A. Yes. 9 Q. Can you describe that a little more? 10 A. Well, he would just write prescription, RX is what he 11 did, and write the amounts, but not specifics. 12 Q. And then you would enter that into QuickBooks? 13 A. Yes. 14 Q. Under an expense or expenditure? 15 A. Under prescriptions. Personal. 16 Q. Prescriptions personal? 8 DEPOSITION EXHIBITS 1-11 9 1:53 p.m. 10 (Back on the record at 1:53 p.m.) 11 BY MR. CAMARGO: 12 Q. All right, ma'am. I am showing you what's been marked at Exhibit 1. I'm giving you what's been marked at Exhibit 1. It's two separate documents. Do you recognize either of those documents? 16 A. No.	
9 Q. Can you describe that a little more? 10 A. Well, he would just write prescription, RX is what he did, and write the amounts, but not specifics. 12 Q. And then you would enter that into QuickBooks? 13 A. Yes. 14 Q. Under an expense or expenditure? 15 A. Under prescriptions. Personal. 16 Q. Prescriptions personal? 18 1:53 p.m. 19 (Back on the record at 1:53 p.m.) 10 (Back on the record at 1:53 p.m.) 11 BY MR. CAMARGO: 12 Q. All right, ma'am. I am showing you what's been marked at Exhibit 1. It's two separate documents. Do you recognize either of those documents? 16 A. No.	. 1
10 A. Well, he would just write prescription, RX is what he 11 did, and write the amounts, but not specifics. 12 Q. And then you would enter that into QuickBooks? 13 A. Yes. 14 Q. Under an expense or expenditure? 15 A. Under prescriptions. Personal. 16 Q. Prescriptions personal? 10 (Back on the record at 1:53 p.m.) 11 BY MR. CAMARGO: 12 Q. All right, ma'am. I am showing you what's been marked as Exhibit 1. It's two separate documents. Do you recognize either of those documents? 16 A. No.	ſ
did, and write the amounts, but not specifics. 12 Q. And then you would enter that into QuickBooks? 13 A. Yes. 14 Q. Under an expense or expenditure? 15 A. Under prescriptions. Personal. 16 Q. Prescriptions personal? 11 BY MR. CAMARGO: 12 Q. All right, ma'am. I am showing you what's been marked as exhibit 1. It's two separate documents. Do you recognize either of those documents? 16 A. No.	
12 Q. And then you would enter that into QuickBooks? 13 A. Yes. 14 Q. Under an expense or expenditure? 15 A. Under prescriptions. Personal. 16 Q. Prescriptions personal? 12 Q. All right, ma'am. I am showing you what's been marked at Exhibit 1. I'm giving you what's been marked at Exhibit 1. It's two separate documents. Do you recognize either of those documents? 16 A. No.	
13 A. Yes. 14 Q. Under an expense or expenditure? 15 A. Under prescriptions. Personal. 16 Q. Prescriptions personal? 18 as Exhibit 1. I'm giving you what's been marked at Exhibit 1. It's two separate documents. Do you recognize either of those documents? 16 A. No.	
14 Q. Under an expense or expenditure? 15 A. Under prescriptions. Personal. 16 Q. Prescriptions personal? 11 Exhibit 1. It's two separate documents. Do you recognize either of those documents? 16 A. No.	rked
15 A. Under prescriptions. Personal. 16 Q. Prescriptions personal? 16 A. No.	.· , iii
16 Q. Prescriptions personal?	iii ii
	- 4
17 A Vesh	The state of the s
1 - 2 Okay. The going to thank the second one, if I can,	
18 Q. Is that what the category - 18 actually I'll just do 2. Take it easy. It will	H.
19 A. It's under medical insurance prescriptions, yes. 19 be fine. Do you recognize those documents at all?	
20 Q. Okay. Were you aware that he also paid some, that he 20 A. No. I don't.	titale:
21 paid medical bills of his in addition to 21 Q. If those were — Well, let me ask you, on Exhibit 1,	4
22 prescriptions? 22 Exhibit 1 has what appears to be a receipt, then a	12
23 A. I don't remember seeing anything set out as medical 23 computer little credit card or charge card receipt,	E PORTE
24 bills. 24 and then at the bottom a check; is that correct?	. 100
25 Q. Were you aware that he paid dental bills of himself or 25 A. Yes.	100
Page 38 Page 1 his wife? 2 A. Yes. 3 Q. How would you come to have that knowledge? 4 A. Only when a check to the dentist would cross my desk. Page 1 Q. Focusing your attention on the check down at the bottom, do you recognize not that specific check but the type of check that that was drawn on or written on?) Эмининий принципаний принципаний принципаний принципаний принципаний принципаний принципаний принципаний принц
5 Which it sometimes did and sometimes didn't. 5 A. It would help to see the account πumber at the bott	n. 🎚
6 Q. What do you mean by sometimes did, sometimes didn't? 6 of the check, but it looks like it's one of ours.	
7 A. Well, sometimes he mails out his own bills. 7 Q. If a check like that was used to pay dental bills or	
8 Q. Okay. So sometimes he would give it to you and say, 8 any other types of bills, again, your testimony today	
9 "Hey, I need this mailed out"? 9 is you would not necessarily see it come across your	
10 A. Uh-huh. 10 desk?	
11 Q. And sometimes you just wouldn't even see it other than 11 A. Correct.	
the notation telling you how to mark it as an expense? 12 Q. It might get sent out by Mr. Seifman directly; is that	
13 A. But I don't believe I ever saw a dentist bill coming 13 correct?	
14 out of the firm's checking account. 14 A. Yes.	
15 Q. How long had you had the management duties over 15 Q. Would you always receive, to the best of your	E CONTRACTOR OF THE CONTRACTOR
16 managing the checking account? 16 knowledge, however, some sort of indication that it	THE STATE OF THE S
17 A. Oh, goodness. After Foster and Paliti moved out, it 17 was paid out?	
18 fell to me. 18 A. Not for something like this, no.	Haller
19 Q. Why don't you tell us when that would have been? 19 Q. So how would you be able to balance the checking	Sing.
20 A. That was in 2002 or Yeah, 2002.	
21 Q. So, since 2002, you had been balancing and managing 21 unaware that, for example, a check in the amount of	
22 the checking account? 22 \$88 was issued?	
23 A. Yes. 23 A. I would have it noted as payee is Capital One and the	i i
24 Q. When you say Foster and Paliti in your answer just two 24 check number and the date.	<u> </u>
25 answers ago, you were referring to the accounting firm 25 Q. Okay.	ė
	į

Page 41 1 A. But 2 Q. Now would you know that proyee was Capital One, again 3 If didn't care somes your desk in mist out, then your would have 6 covers to the check correct? 7 A. Yes. 8 Q. If I didn't care somes your desk which you 9 settled happens from from to them, your testimonly 10 was generally your would receive semething from the, 111 Selfman, folling you that a check had been pid out, 122 correct? 13 A. Most of the time, yes, for something like this. 14 Q. If you dish treevie or how early trovided per if, how would you know been able to believe the checking. 15 A. I would have to look at the bank statement and check. 16 the check by number and amounts against what; I had in good you would have to check the dishes in the checking the checks? 17 A. I would have to look at the bank statement and check. 18 the check by number and amounts against what; I had in good you would have to check the checking. 19 QuickBooks. 20 Q. When you said you would have to check the checking. 21 A. If it is cable/internet bill. 22 would you would you would have to check the checking. 23 A. From the bank statement. It has the check numbers and the checking the checks? 24 A. If I had one, yes. 25 Q. Connet. Would you would you know have to check the checking. 26 Q. When you would have to check the checking. 27 A. I would have to look at the bank statement and check. 28 A. If I had one, yes. 29 Q. Connet. Would you when conservity that what a copy our acceptable of the check? 20 A. If I had one, yes. 30 A. For the shark statement. It has the check numbers and the same and the checking the checks? 31 A. For the bank statement. I has the check numbers and the check have been acceptable of the one share you would you know to you would have to check the dependent of the distribution of the document of my your would have to check the been same your desk to your would you know to you would have to check the bear of the check? 20 A. If I had one, yes. 31 A. For the bank statement. I has the check number to your would have to chec					
2 Q. How would you know that payes van Capital One, again 3 If it don't come arous your deak it mail out, then you would have 6 access to the chocks correct? 7 A. Yes. 8 Q. If it don't come access your deak which you 9 setselffel happeer from time to time, your testimory 10 was generally you would receive comething from hir. 11 Selfisan, telling you that a check had been paid out; 12 correct? 13 A. Most of the time, yes, for something like this; 14 Q. If you didn't neceive or have any trowkled or it. 15 would you have been able to bilance the checking 16 account? 17 A. I would have to look at the bank statement and check 18 the checks by momber and ameuints against what I had in 19 Quickbooks. 20 Q. When you said you would have to check the checks; 21 would you, world you in his would you know how to differ the amount. It doesn't necessarily have this payees. 22 Q. Connect. Would you then creaverify that with a carp Page 42 10 of the check? 2 A. If I had one, yes. 3 Q. Tyou didn't have one, how would you know how to attribute it or charactarise it or categories it in young, happen in your young would not be attributed. For charactarise it or categories it in young wherein a check that register. 2 Q. Connect. Would you than creaverify that with a carp Page 42 1 of the check? 2 A. If I had one, yes. 3 Q. Tyou didn't have one, how would you know how to attribute it or charactarise it or categories it in young wherein a check had statement it had been a check had statement in the payees. 2 Q. Connect. Would you would go ask Barry, What's this for? I carth figure it out? 2 Q. So with respect to J, you've neyer seen that before them? 3 A. I don't. 3 Q. How should with respect to Exhibit 2? 4 A. Yes. 5 A. I don't. 5 A. I don't. 6 A. I would have a check that's been paid out and you notice, key, we're offy yes 80. Oh, it check 10 Q. So, hypothetically, let's say Barry doesn't give you any information about a check that's been paid out and you notice, key we're offy yes 80. Oh, it check 10 Q. So, hypothetically, let		Page 4	11	Page	43
3	1 A. But	•	li	A. Oh, yes.	
3 A. That's Barry's handwriting. 4 made that confusing. Maybe we can sent over. It's 5 came across your deak to mail out, they you would have 6 secess to the check; correct? 7 A. Yes. 8 Q. If a dish't come across your deak which you. 9 testified happeas from time to time, your testimoly 10 was generally you would receive something from hir. 11 Selfman, telling you that a check the deen paid ox; 12 correct? 13 A. Most of the time, yes, for something like this. 14 Q. If you dish't receive or have any foundedge of it, how 1. 15 yound you have to look at the bank statement and check the checked by number and amounts against what I had in 19 QuickBooks. 10 Q. When you side you would have to creat the check numbers and the amount. It doesn't necessarily have the payers. 25 Q. Conect. Would you what coresverify that with a carp. Pa. ge 42 1 of the check? 2 A. If I had one, yes. 3 A. From the bank statement. It has the check numbers and the amount. It doesn't necessarily have the payers. 25 Q. Conect. Would you when coresverify the with a cry 26 Q. They you dish't have one, how would you know how to attribute it or characterize it or catogorize it in QuickBooks. 7 Q. So, hypothecically, let's say Barry doesn't give you notice, hey, we're off by \$98. Oh, is it check you're attribute it or characterize it or catogorize it in 20 Q. So with respect to 1, you've never seen that before them? A. Yes. 10 Q. You dish't have any specific recollection at this time? 11 can't figure it out? 12 A. Yes. 13 A. I don't. 14 A. I don't. 15 A. I don't. 26 Q. With respect to both — actually, with respect to 20 with respect to both — actually, with respect to 20 with respect to both — actually, with respect to 22 with respect as called in which the payers. 15 A. Don't. 16 Q. Word with the care of by \$98. Oh, is it check numbers and the analyse of the check numbers and you notice, hey, we're off by \$98. Oh, is it check numbers and you notice, hey, we're off by \$98. Oh, is it check numbers and you notice, hey, we're off by \$98. Oh, is it	2 O. How would you k	now that payee was Capital One, again	2	Q. How do you recognize that?"	
4 made that confusion. Maybe we can exact over. If it is came stross your desk to mail out, then you would have a cacess to the check; correct? 7 A. Yes. 8 Q. If a didn't come across your desk, which you set stiffed happens from time to time, your testimeny you was generally you would receiv so mentiting from the. 10 was generally you would receiv so mentiting from the. 11 Saffane, tabling you that a check had been paid out; correct? 13 A. Most of the time, yes, for something like this. 14 Q. If you didn't receive or have any introvilence of it, how you'd you have been able to balance the checking the check's by number and amounts against what I had in quickgooks. 20 Q. When you side you would have to look at the bank statement and check the check's you would you what would you you go about the expective checks? 21 A. From the bank statement. It has the check humbers and the amount. It doesn't necessarily have the payees. 22 Q. Cowy. Tell me about it. What is it? 23 A. From the bank statement. It has the check humbers and the amount. It doesn't necessarily have the payees. 24 Q. Cowy. Tell me about it. What is it? 25 Y. M. Q. Wad you doesn't have one, how would you know how to a attribute 8 or characterize it or categorize it in you've never seen that before them? 26 A. If I had one, yees, or far she would you whom how to a arry information about a does that he payed have a checked attached to the bill and an envelope for me to mail out. 27 A. Yes. Or I'd check the register. 28 A. Yes. Or I'd check the register. 29 Q. Cowy. The mail would you would you know how to any information about a department of the you would you wou			3	A. That's Barry's handwriting.	
5 came across to the check; correct? 7 A. Yes. 8 Q. If it didn't come across your desk, which you 9 testified happens from time to time, your testimeny 10 vins generally you would receive semething from thr. 11 Selfinan, tolling you that at check that better paid out 12 correct? 13 A. Most of the time, yes, for something like this. 14 Q. If you didn't here we have my knowledge of it, how 15 would you, have been able to believe the checking 16 account? 17 A. I would have to look at the bank statement and check 18 the checks by number and amounts against what I had in 19 Quickdooks. 20 Q. Whan you said you would know to check the checks pumber and amounts against what I had in 20 Quickdooks. 21 would you, would would have to check the benefit and the amount. It doesn't necessarily have the payees. 22 Q. Correct. Would you then conserverify that with a cory 23 Q. Flore didn't here we not conserver that what a cory 24 A. If I had one, yes. 3 Q. If you didn't have one, how would you know how to attribute it or characterize it or categorize it in 4 Quickdooks. 4 A. I would ask Barry or get the register. 5 Q. Correct. Would you would go set Sarry, "what's this for? I Quickdooks. 6 A. I would ask Barry or get the register. 7 Q. So, hypochetically, let's say Barry doesn't give you any furniformation about a check that's been paid out and you notice, hey, we're off by \$88. Oh, is it check years any furniformation about a check that's been paid out and you would would ask Barry, "what's this for? I can be provided to the bill and an envelope for me to mail out. I have the paid the paid the paid the paid the paid that the paid that the paid that of the bill and an envelope for me to mail out. 9 Q. Ore would have a check that's been paid out and you would would have been paid out and you would so when the paid it. 19 Q. Ore would ask Barry or get the register. 20 Q. So, hypochetically, let's say Barry doesn't give you any furnified the paid to the bill and an envelope for me to mail out. 21 C. Q. So with respect to 1, y	1		4	Q. Are you familiar with that handwriting?	
6 excess to the check; correct? 7 A. Yes. 8 Q. If you didn't have one, how would you know how to attribute 8 to characterize 8 to checked? 2 A. If I had one, yes. 3 Q. If you didn't have one, how would you know how to attribute 8 to characterize 8 to categorize 11 can't figure 8 to did.? 2 A. I would have come, how would you know how to attribute 8 to characterize 8 to categorize 11 can't figure 8 to did.? 3 Q. So, hypothetically, let's say Barry doesn't give you any information about a check that been paid out and you notice, hey, we're off by \$88. Oh, is it check 19 gags? You would go ask Barry, "What's this for? I can't figure 8 to did.? 3 Q. Work respect to 1, you've never seen that before then? 4 A. I don't. 5 Q. With respect to 1 both— actually, with respect to both— actually, with respect to 5 of the check 20 Q. With respect to both— actually, with respect to 5 of the check 20 Q. With respect to both— actually, with respect to 5 of the check 20 Q. With respect to both— actually, with respect to 5 of the checked? 4 D. How about with respect to 5 of the checked? 5 Q. With respect to 5 both— actually, with respect to 5 of the check 20 Q. With respect to 5 both— actually, with respect to 5 of the checked? 5 Q. With respect to 5 both— actually, with respect to 5 of the checked? 6 Q. With respect to 5 both— actually, with respect to 5 of the checked actually with the manual respect to 5 of the checked actually with respect to 5 of th			5	A. Very.	
7 A. Yes. 8 Q. If it didn't come across your desk, which you so testimely leaves generally you would receive something from Mr. 11 Selfman, tailing you that a check het been paid out 12 correct? 13 A. Most of the time, yes, for something like this, ward you would neceive something like this, ward you have been able to balance the chacking like this checks by number and amounts against what I had in 19 Quickdooks. 10 Q. Whon you wishing the checks the checks by number and amounts against what I had in 19 Quickdooks. 11 Yound have to look at the bank statement and check the checks by number and amounts against what I had in 19 Quickdooks. 12 wead you would have to check the checks. 13 A. From the bank statement. It has the check numbers and the manum. It doesn't necessarily have the payes. 14 C. Ciew, I'm going to show you what's a two-page down the check go the check? 15 A. I don't recall seeing that. 16 Q. You don't have one, how would you know how to a strikute it or characterize it or desportes it in 20 Ciew, we're off by \$38. Oh, is it check to 20 Sep? You would you go ask Barry, "What's this for? I Can't figure it out?" 16 A. I don't recall seeing that. 17 A. I don't recall seeing that. 18 Q. You don't have any specific recollection at this time? 19 MR. WARREN: She's already answered. Go ahead. 20 Q. With respect to 1, you've never seen that before then? 21 A. No. 22 P WR. CAMARGO: 23 Q. With respect to both — actually, with respect to 24 Belbit 2, there's handwriting on that. Do you 24 Belbit 2, there's handwriting on that. Do you 25 I have for the check to be bill was not by the payers or belbit 10 years are across your desk? 25 Q. You don't have any specific recollection at this time? 26 Q. You don't have any specific recollection at this time? 27 A. I don't recall seeing that. 28 Q. You don't have any specific recollection at this time? 29 Q. You don't have any specific recollection at this time? 30 Q. You don't have any specific recollection at this time? 31 A. No. 32 Q. With respect to both — actually	,		6	Q. Appears to say PD, then CK, then the number 7913,	
8 Q. If it didn't come across your desk, which you 9 test/fied happens from time to time, your testimeny 10 was generally you would needer somewing from Mr. 11 Selfman, telling you that a check had been paid out 12 correct? 13 A. Most of the time, yes, for something like this. 14 Q. If you didn't receive or have any knowledge of it, how would you have been able to balance the checking account? 16 account? 17 A. I would have to look at the bank statement and check the checks by number and amounts against what I had in 19 Quickdooks. 20 Q. When you said you would have to check the check. 21 would you, would you whave to pok at the check humbers and the memount. It doesn't necessarily have the payees. 22 A. If I's had one, yes. 23 A. From the bank statement. It has the check humbers and the memount. It doesn't necessarily have the payees. 25 Q. Cerect. Would you then cross-verify that with a capy 26 A. If I's had one, yes. 3 Q. If you didn't have one, how would you know how to attribute it or characterise it or categorize it house any information about a check that's been paid out and you notice, hey, we're off by \$88. Oh, is it check then? 26 A. Yes, Or I'd check the register. 3 Q. So, hypochetically, let's say Barry doesn't leve you any information about a check that's been paid out and you notice, hey, we're off by \$88. Oh, is it check then? 3 A. Yes, Or I'd check the register. 4 A. Yes, Or I'd check the register. 5 A. I don't recall seeing that. 6 Q. You don't have any specific recollection at this time? 7 A. I don't recall seeing that. 9 Q. With respect to 1, you've never seen that before them? 10 Q. With respect to 5 whith a capy of the check the register. 11 A. No. 12 A. No. 13 A. No. 14 A. No. 15 Collection the account? 15 A. I don't recall seeing that. 16 Q. You don't have any specific recollection at this time? 17 A. I don't. 18 Q. How about with respect to Exhibit 2? 19 MR. CAMARGO: 20 Q. With respect to 1, you've never seen that before then? 21 A. No. 22 YM. C. CAMARGO: 23 Q. With respect to 5 whith a	i		7	something scratched and then 1-10-08. Do you make	i
yes restried happens from time to the your testimony was generally you would receive something from Mr. 12 correct? 13 A. Most of the time, yes, for something like this. 14 Q. If you didn't receive or have any knowledge of I, how would you have been able to bislance the checking account? 15 A. I would have to look at the bank statement and check the checks by number and amounts against what I had in 9 QuickBooks. 20 Q. When you said you would have to check the chads, 21 weadd you, would you in how would you po about 22 checking the checks? 21 A. From the bank statement. It has the check numbers and the amount. It doesn't necessarily have the payes. 22 A. From the bank statement. It has the check numbers and the amount. It doesn't necessarily have the payes. 23 Q. Corect. Would you then cross-verify that with a copy Page 42 1 of the check? 2 A. If I had one, yes. 3 Q. If you didn't have one, how would you know how to attribute it or characterize it or categorize it in Cycle Books? 4 A. If under the check Barry or get the register. 5 Q. So, hypochetically, let's say Barry doesn't give you any information about a check that's been paid out and you notice, hey, we're orff by \$98. Oh, is theck then any information about a check that's been paid out and you notice, hey, we're orff by \$98. Oh, is theck then any information about a check that's been paid out and you notice, hey, we're orff by \$98. Oh, is theck then any information about a check that's been paid out and you notice it on the corporation's checking account? 2 A. Yes. 3 Q. So with respect to 1, you've never seen that before then? 3 A. I don't recall seeing that. 4 A. Idon't recall seeing that. 5 Q. So with respect to 1 Ediblik 2? 9 MR. WARREN: She's already answered. Go ahead. 9 With respect to both — actually, with respect to a cable bill was not for the firm's internet or cable bill that the firm's internet cable bill was not for the firm's internet or cable bill that the firm had?	Ţ.	cross your desk, which you	8	Does that signify anything to you?	1
10 was generally you would needed something from Mr. 111 Selfman, brilling you that a check had been paid ood. 112 correct? 13 A. Most of the time, yes, for something like this. 14 Q. If you didn't receive or have any knowledge of 2, how would you have been able to balance the checking account? 17 A. I would have to look at the bank statement and check 18 the checks by number and armounts against what I had in 19 QuickBooks. 20 Q. When you said you would have to check the chados, 21 would you know how to 22 checking the checks? 21 A. From the bank statement. It has the check numbers and 44 the amount. It doesn't necessarily have the payers. 22 Q. Correct. Would you then cross-verify that with a copy Page 42 1 of the check? 2 A. If I had one, yes. 3 Q. If you didn't have one, how would you know how to 3 any information about a check that's been paid out and you notice, hery, we're off by \$58. Oh, is it check 9298? You would go ask Sarry, "What's this for? I can't figure it dut?? 2 A. Yes, O's do theck the register. 3 Q. So with respect to 1, you've never seen that before then? 4 A. I don't recall seeing that. 5 Q. You don't have any specific recollection at this time? 6 Q. You've see a check to mail out and yet you would go ask Sarry, "What's this for? I can't figure it dut?? 1 A. You don't have any specific recollection at this time? 1 A. I don't recall seeing that. 3 A. I don't recall seeing that. 4 A. I don't recall seeing that. 5 Q. You don't have any specific recollection at this time? 6 Q. How about with respect to Edilik 2? 7 A. No. 8 A. It was monthly. 9 Q. With respect to both — actually, with respect to 24 Edilik't 2, there's bandwriting on that. Do you 2 P MR. WARREN: She's already answered. Go ahead. 9 Que there see that of the register. 10 Q. With respect to both — actually, with respect to 24 Edilik't 2, there's bandwriting on that. Do you 2 P MR. CANARGO: 3 A. No. 3 A. Yes. 4 D. John and the paid? 5 Coley. Tim going to show you what's a two-cape document that I was marked as Exhibit 3. Do you h			9	A. That's the check number he paid and when he paid	īŁ.
11 Selfman, telling you that a check had been paid out; 12 correct? 13 A. Most of the time, yes, for something like this. 14 Q. If you didn't receive on have any knowledge of it, how would you have been able to balance the checking? 16 account? 17 A. I would have to look at the bank statement and check the checks by number and amounts against what I had in guidekeooks. 18 would you, would have to check the checks, would you, would have to check the checks by number and amounts against what I had in guidekeooks. 20 Q. When you said you would have to check the checks, would you, would you would have to check the checks, would you, would you would have to check the checks, would you, would you would have to check the checks, would you, would you would have to check the checks, would you, would you would have to check the checks, would you, would you would have to check the checks, would you would have to check the checks, would you, would you would you would you would have to check the payers. 25 Q. Correct. Would you then cross-verify that with a copy Page 42 1 of the check? 2 A. If I had one, yes. 3 Q. If you didn't have one, how would you know how to attribute it or characterize it or categorize it in QuickBooks? 4 Q. Jou didn't have one, how would you know how to any information about a check that's been paid out and you notice, key, were off by \$80. Oh, is theck them? 3 A. Yes. 4 Q. So, hypothetically, let's say Barry doesn't give you any information about a check that's been paid out and you notice, key, we're off by \$80. Oh, is theck 4 Q. You would not be it out? 4 A. Yes. 4 Q. You don't have any specific recollection at this time? 5 A. I don't recall seeing that. 5 A. I don't recall seeing that. 6 Q. You don't have any specific recollection at this time? 7 A. I don't recall seeing that. 8 Q. Ware there time. We have the about we have t	•	-	10	Q. Would something like this come across your desk so	
12 carrect? 13 A. Most of the time, yes, for something like this. 14 Q. If you didn't receive or have any knowledge of it, how 15 would you have been able to balance the checking 16 account? 17 A. I would have to look at the bank statement and check 18 the checks by number and amounts against what I had in 19 Quickdooks. 20 Q. When you said you would have to check the checks, 21 would you, would you in thow would you go about 22 checking the check? 23 A. From the bank statement. It has the check numbers and the amount. It doesn't necessarily have the payees. 25 Q. Corsect. Would you then cross-verify that with a copy Page 42 1 of the check? 2 A. If I had one, yes. 3 Q. If you didn't have one, how would you know how to 4 attribute it or characterize it or categorize it in QuickBooks? 4 A. I would ask Barry or get the register. C. So, hypothetically, let's say Barry doesn't give you any information about a check thirds been paid out and you notice, hey, we're off by \$98. Oh, is it check 2929? You would go ask Barry, "What's this for? I Can't figure it out"? 18 A. I don't recall seeing that. C. You don't have any specific recollection at this time? 19 A. I don't 10 Qiky. Is that comething that regularly came across your desk such as the one that you have before you? 20 A. Hill had one, yes. 3 Q. If you didn't have one, how would you know how to a stiribute it or characterize it or categorize it in QuickBooks? 4 A. If A. I don't recall seeing that. C. So with respect to 1, you've never seen that before then? 2 A. If his a cable/ intermet bills regularly came across your desk such as the one that you have before you? 2 A. Hew did they come across your desk? 4 Q. How did they come across your desk? 5 A. He, Barry, would have a checked attached to the bill and an envelope for me to mail out. 9 QuickBooks? 4 Q. Were theref times where it didn't happen; in other words, you don't receive a check to mail out and yet you would notice it on the account? 10 Q. Were theref times where it didn't happen; in other words, you			11	that you would know what he paid?	
A. Most of the time, yes, for something like this. 1			12	A. No, I would have to get that off the register.	
document that I've marked as Exhibit 3. Do you have send as exhibit 3. Do you have account? 16 account? 17 A. I would have to look at the bank statement and check the checked by number and amounts against what I had in 19 QuickBooks. 20 Q. When you said you would have to check the checks, would you. would you in How would you go about the amount. It doesn't necessarily have the payees. 21 would you, would you then cross-verify that with a copy Page 42 22 A. If I had one, yes. 3 Q. If you didn't have one, how would you know how to attribute it or characterize it or categorize it in any way, shape or form? 19 A. I do. 10 Q. Okay. Tell me about it. What is it? 20 Q. Okay. Is that something that regularly came across your deak? 21 A. If Yes. 22 A. If I had one, yes. 3 Q. If you didn't have one, how would you know how to attribute it or characterize it or categorize it in you have a checked attached to the bill and an envelope for me to mall out. 20 QuickBooks? 21 A. Yes. Or I'd check the register. 22 Q. So, hypothetically, lest's say Barry doesn't give you any information about a check that's been paid out and you notice, hey, we're off by \$88. Oh, is it check 9299? You would go ask Barry. What's this for? I can figure it out? 22 A. Yes. Or I'd check the register. 23 A. Yes. Or I'd check the register. 24 Q. You don't have any specific recollection at this time? 25 A. I don't. 26 Q. Okay. Tell me about it. What is it? 27 A. I to. 28 Q. No. 29 Wife provision of the document; right? 29 MR. WARREN: She's already answered. Go ahead. 20 A. It was monthly. 21 A. No. 22 BY MR. CAMARGO: 22 Q. Wife provision of the document; right? 23 A. Yes. 24 Lebiblit 2, there's handwriting on that. Do you 25 BY MR. CAMARGO: 26 A. If was there a separate internet to cable bill was not for the firm's internet or cable; bill that the firm had? 27 Q. Wife provision of the deak than and an envelope for me to mall out and you would notice ton the corporation's checking account? 27 A. Yes. 28 A. How about wit	•	ves, for something like this.	13	Q. Okay. I'm going to show you what's a two-page	100
15 would you have been able to balance the checking account? 17 A. I would have to look at the bank statement and check the checks by number and amounts against what I had in Quicksbooks. 20 Q. When you said you would have to check the checks, would you would you getout checking the checks? 2 A. From the bank statement. It has the check numbers and the amount. It doesn't necessarily have the payees. 2 Q. Cornect. Would you then cross-verify that with a copy Page 42 1 of the check? 2 A. If I had one, yes. 3 Q. If you didn't have one, how would you know how to attribute it or characterize it or categorize it in QuickBooks? 4 A. I would ask Barry or get the register. 5 Q. QuickBooks? 6 A. I would ask Barry or get the register. 7 Q. So, hypothetically, let's say Barry doesn't give you any Information about a check that's been paid out and you notice, hey, we're off by \$38. Oh, is it check \$29399. You would go ask Barry, "What's this for? I can't figure it out"? 12 A. Yes. Or Tid check the register. 13 Q. So with respect to I, you've never seen that before then? 14 then? 15 A. I don't receils seeing that. 16 Q. How about with respect to Exhibit 2? 17 A. I don't receive a check to mail out and yet you would ontote it on the corporation's checking account? 18 Q. How don't have any specific recollection at this time? 19 MR. WARREN: She's already answered. Go ahead. 20 ahead. 21 A. No. 22 BY MR. CAMARGC: 23 Q. With respect to both — actually, with respect to the firm's internet case separate internet or cable bill was not for the firm's internet case; correct? 24 Eshibit 2, there's handwriting on that. Do			14	document that I've marked as Exhibit 3. Do you have	
16 account? A. I would have to look at the bank statement and check 18 the checks by number and amounts against what I had in 19 QuickBooks. 20 Q. When you sid you would have to check the checks, 21 would you, would you — How would you go about 22 checking the checks? 23 A. From the bank statement. It has the check numbers and 24 the amount. It doesn't necessarily have the payees. 25 Q. Correct. Would you then cross-verify that with a copy Page 42 1 of the check? 2 A. If I had one, yes. 3 Q. If you didn't have one, how would you know how to 4 attribute it or characterize it or categorize it in 5 QuickBooks? 4 A. I would ask Barry or get the register. 7 Q. So, hypothetically, let's say Barry doesn't give you 8 any information about a check that's been paid out and 9 you notice, hey, we're off by \$58. Oh, is theck 10 9289? You would go ask Barry, "What's this for? I 11 can't figure it out"? 12 A. Yes. Or I'd check the register. 3 Q. So with respect to 1, you've never seen that before then? 14 then? 15 A. I don't recall seeing that. 6 Q. You don't have any specific recollection at this time? 17 A. I don't. 18 Q. How about with respect to Exhibit 2? 19 MR. WARREN: She's already answered, Go ahead. 20 With respect to both — actually, with respect to 21 A. No. 22 BY MR. CAMARGO: 23 Q. With respect to both — actually, with respect to 24 Exhibit 2, there's handwriting on that. Do you 24 Exhibit 2, there's handwriting on that. Do you 25 BY MR. CAMARGO: 26 Correct. Would have a checked attached to the bill and an envelope for me to mail out. 26 A. I don't recall seeing that. 27 Q. Were there times where it didn't happen, did you ever ask him whether he needed to pay or anything? 38 A. I don't recall seeing that. 49 Q. I don't have any specific recollection at this time? 39 A. I don't recall seeing that. 40 Q. How about with respect to both — actually, with respect to to brid in the corporation's checking account? 40 A. No. 41 I was monthly. 42 A. No. 43 C. Were there times bout fi. What is it? 44 D. Do d'ten they come			15	any specific recollection of that document or can you	
17 A. I would have to look at the bank statement and check 18 the checks by number and amounts against what I had in 19 QuickBooks. 20 Q. When you said you would have to check the checks, 21 would you would you — How would you go about 22 cheeding the checks? 23 A. From the bank statement. It has the check numbers and 24 the amount. It doesn't necessarily have the payees. 25 Q. Correct. Would you then cross-verify that with a copy Page 42 1 of the check? 2 A. If I had one, yes. 3 Q. If you didn't have one, how would you know how to 4 attribute it or characterize it or categorize it in 5 QuickBooks? 6 A. I would ask Barry or get the register. 7 Q. So, hypothetically, let's say Barry doesn't give you any information about a check that's been paid out and you notice, hey, were off by \$38. Oh, is it check 10 9289? You would go ask Sarry, "What's this for? I 11 can't figure it out"? 12 A. Yes. Or I'd check the register. 4 Q. You don't have any specific recollection at this time? 14 then? 15 A. I don't recall seeing that. 6 Q. You don't have any specific recollection at this time? 16 Q. How about with respect to Exhibit 2? 17 A. I don't recall seeing that. 18 Q. How about with respect to Exhibit 2? 19 MR. WARREN: She's already answered. Go ahead. 20 A. No. 21 By MR. CAMARGO: 22 By MR. CAMARGO: 23 Q. With respect to both — actually, with respect to 24 Exhibit 2, there's handwriting on that. Do you 24 Exhibit 2, there's handwriting on that. Do you 25 By MR. CAMARGO: 26 Corect. Would have to check the checks, 27 A. It was anothly. 28 A. If a do, I that something that regularly came across your desk? 29 A. If I was a calle [Internet bills. 20 Chay. It that something that regularly came across your desk? 21 A. Hr. Yes. 22 By MR. CAMARGO: 23 Q. With respect to both — actually, with respect to 24 Exhibit 2, there's handwriting on that. Do you 25 Do Mark at the particular to understing the troub it. What is it? 26 Q. Okay. It that something that regularly came across your desk? 27 A. It - Yes. 28 A. It - Yes. 29 A. H. From			16		
the checks by number and amounts against what I had in QuickBooks. Q. When you said you would have to check the checks, would you, would you would you be not checking the checks? A. From the bank statement. It has the check numbers and the amount. It doesn't necessarily have the payees. Q. Correct. Would you then cross-verify that with a copy Page 42 1 of the check? A. If I had one, yes. Q. If you didn't have one, how would you know how to attribute it or characterize it or categorize it in QuickBooks? A. I would ask Barry or get the register. Q. So, hypothetically, let's say Barry doesn't give you any information about a check that's been paid out and you notice, hey, we're off by \$68. Oh, is it check 10 9289? You would go ask Barry, "What's this for? I can't figure it out?" A. Yes. Or I'd check the register. Q. So with respect to 1, you've never seen that before then? A. I don't recall seeing that. Q. How about with respect to Exhibit 2? A. No. PMR. WARREN: She's aiready answered. Go ahead. A. No. BY MR. CAMARGO: Q. Was there a separate internet bill. What is the regularly come across your desk such as the one that you have before you? A. Hey Barry, would have a checked attached to the bill and an envelope for me to mail out. Q. How did they come across your desk? A. Hey Barry, would have a checked attached to the bill and an envelope for me to mail out. Q. How did they come across your desk? A. Hey Barry, would have a checked attached to the bill and an envelope for me to mail out. Q. How did they come across your desk? A. Hey Barry, would have a checked attached to the bill and an envelope for me to mail out. Q. How did they come across your desk? A. Hey Barry, would have a checked attached to the bill and an envelope for me to mail out. Q. How did they come across your desk? A. Hey Barry, would have a checked attached to the bill and an envelope for me to mail out. Q. Were there times where it didn't happen; in other words, you didn't receive a check to mail out and yet you wo		ook at the bank statement and check	1	A. I do.	
QuickBooks. 20 Q. When you said you would have to check the checks. 21 would you, would you. How would you go about checking the checks? 22 checking the checks? 23 A. From the bank statement. It has the check numbers and the amount. It doesn't necessarily have the payees. 25 Q. Correct. Would you then cross-verify that with a copy Page 42 1 of the check? 2 A. If I had one, yes. 3 Q. If you didn't have one, how would you know how to attribute it or characterize it or categorize it in QuickBooks? 6 A. I would ask Barry or get the register. 7 Q. So, hypothetically, let's say Barry doesn't give you any information about a check that's been paid out and you notice, hey, we're off by \$58. Oh, is it check 9289? You would go ask Barry. "What's this for? I can't figure it out"? 12 A. Yes. On'I'd check the register. 13 Q. So with respect to 1, you've never seen that before then? 14 then? 15 A. I don't recall seeing that. 16 Q. You don't have any specific recollection at this time? 17 A. I don't recall seeing that. 18 Q. How about with respect to Exhibit 2? 19 MR. WARREN: She's already answered. Go ahead. 20 With respect to both — actually, with respect to 23 Q. With respect to both— actually, with respect to 23 Q. With respect to both— actually, with respect to 23 Q. With respect to both— actually, with respect to 23 Q. With respect to both— actually, with respect to 24 Exhibit 2, there's handwriting on that. Do you 19 Okay. Is that something that requilarly came across your desk? 21 A. It - Yes. 22 A. It - Yes. 23 A. It - Yes. 44 A. It - Yes. 45 BY MR. CAMARGO: 40 Did cable/internet bills regularly come across your desk such as the one that you have before you? 41 A. Yes. 42 A. If I had one, yes. 43 A. Yes. 44 By Barry, would have a checked attached to the bill and an envelope for me to mail out. 45 A. How did they come across your desk? 46 A. Hey Barry, would have a checked attached to the bill and an envelope for me to mail out. 47 Q. Did that happen every month? 48 A. Most. 49 Q. I			1 .	O. Okay. Tell me about it. What is it?	Table 5
20 Q. When you said you would have to check the checks, 21 would you, would you = How would you go about 22 checking the checks? 23 A. From the bank statement. It has the check numbers and 24 the amount. It doesn't necessarily have the payees. 25 Q. Correct. Would you then cross-verify that with a copy Page 42 1 of the check? 2 A. If I had one, yes. 3 Q. If you didn't have one, how would you know how to 4 attribute it or characterize it or categorize it in 5 QuickBooks? 6 A. I would ask Barry or get the register. 7 Q. So, hypothetically, let's say Barry doesn't give you 4 any information about a check that's been paid out and 9 you notice, hey, we're off by \$38. Oh, is it check 10 9289? You would go ask Barry. "What's this for? I 11 can't figure it out"? 12 A. Yes. Or I'd check the register. 13 Q. So with respect to 1, you've never seen that before 14 then? 15 A. I don't recall seeing that. 16 Q. You don't have any specific recollection at this time? 17 A. I don't recall seeing that. 18 Q. How about with respect to Exhibit 2? 19 MR. WARREN: She's already answered. Go ahead. 20 With respect to both — actually, with respect to 23 Q. With respect to both — actually, with respect to 23 Q. With respect to both — actually, with respect to 23 Q. With respect to both — actually, with respect to 23 Q. With respect to both — actually, with respect to 23 Q. With respect to both — actually, with respect to 23 Q. With respect to both — actually, with respect to 23 Q. With respect to both — actually, with respect to 24 Each A. No. 20 With respect to both — actually, with respect to 23 Q. With respect to both — actually, with respect to 24 Each A. No. 21 Control that a particular document; right? 22 A. It was monthly. 24 In the months that the didn'th period of the bill and an envelope for me to mail out. 35 A. He, Barry, would have a checked attached to the bill and an envelope for me to mail out. 4 Q. How did they come across your desk? 4 He, Barry, would have a checked attached to the bill with the period of the bill hat	į.		1		
would you, would you — How would you go about checking the checks? A. From the bank statement. It has the check numbers and the amount. It doesn't necessarily have the payees. Correct. Would you then cross-verify that with a copy Page 42 I of the check? A. If I had one, yes. Q. If you didn't have one, how would you know how to attribute it or characterize it or categorize it in QuickBooks? A. I would ask Barry or get the register. Q. So, hypothetically, let's say Barry doesn't give you any Information about a check that's been paid out and you notice, hey, we're off by \$88. Oh, Is it check 9289? You would go ask Barry. "What's this for? I can't figure it out"? A. Yes. Or I'd check the register. Q. So with respect to 1, you're never seen that before then? A. I don't recall seeing that. Q. You don't have any specific recollection at this time? A. I don't. Mr. WARREN: She's already answered. Go ahead. A. No. Worst there is constitute it or the firm's internet or cable; correct? A. No. With respect to both — actually, with respect to 23 With respect to both — actually, with respect to 24 End Warre Land part in the time. The word in the corporation's checking account? A. No. With respect to both — actually, with respect to 24 End Warre Land part in the the time where it dight happen; in other words, you dight receive a check to mail out and yet you would notice it on the corporation's checking account? A. No. With respect to both — actually, with respect to 24 With respect to both — actually, with respect to 24 Exhibit 2, there's handwriting on that. Do you	• •	would have to check the checks.	20		diam
checking the checks? A From the bank statement. It has the check numbers and the amount. It doesn't necessarily have the payees. Q Correct. Would you then cross-verify that with a copy Page 42 Page 42 Of the check? A. If I had one, yes. Q If you didn't have one, how would you know how to attribute it or characterize it or categorize it in QuickBooks? A. I would ask Barry or get the register. Q So, hypothetically, let's say Barry doesn't give you any information about a check that's been paid out and you notice, hey, we're off by \$68. Oh, is it check 10 9289? You would go ask Barry, "What's this for? I can't figure it out"? A. Yes. Or I'd check the register. Q So with respect to 1, you've never seen that before then? A. I don't recall seeing that. Q You don't have any specific recollection at this time? A. I don't recall seeing that. Q How about with respect to Exhibit 2? MR. WARREN: She's already answered. Go ahead. A. No. Yes. Or I'd check the register. A. I don't recall seeing that. Q You don't have any specific recollection at this time? A. I don't recall seeing that. Q How about with respect to Exhibit 2? MR. WARREN: She's already answered. Go ahead. A. No. Yes. A. It - Yes. MR. WARREN: You mean something like that, not that particular document; right? BY MR. CAMARGO: A. Yes. Q. Did cable/internet bilis regularly come across your desk such as the one that you have before you? A. Yes. A. He, Barry, would have a checked attached to the bill and envelope for me to mail out. Q. Did that happen every month? A. Most. Q. Unt the months that it didn't happen, ind other words, you didn't receive a check to mail out and yet you would notice it on the account? A. Yeah. Yes. A. No. Yes.			21		
A From the bank statement. It has the checknumbers and the amount. It doesn't necessarily have the payees. 24	1		1		
the amount. It doesn't necessarily have the payees. Q. Correct. Would you then cross-verify that with a copy Page 42 1 of the check? A. If I had one, yes. Q. If you didn't have one, how would you know how to attribute it or characterize it or categorize it in QuickBooks? A. I would ask Barry or get the register. Q. So, hypothetically, let's say Barry doesn't give you any information about a check that's been paid out and you notice, hey, we're off by \$88. Oh, is it check 9289? You would go ask Barry, "What's this for? I can't figure it out"? A. Yes. Or I'd check the register. Q. So with respect to 1, you've never seen that before then? A. I don't recall seeing that. Q. You don't have any specific recollection at this time? A. I don't recall seeing that. Q. You don't have any specific recollection at this time? MR. WARREN: She's already answered. Go ahead. A. No. With respect to both — actually, with respect to 23 Q. With respect to both — actually, with respect to 24 Exhibit 2, there's handwriting on that. Do you A. No. 24 not that particular document; right? BY MR. CAMARGO: D. Did dable/internet bills regularly come across your desk such as the one that you have before you? A. Yes. D. How did they come across your desk such as the one that you have before you? A. Yes. D. How did they come across your desk such as the one that you have before you? A. Yes. D. How did they come across your desk such as the one that you have before you? A. Yes. D. How did they come across your desk such as the one that you have before you? A. Yes. D. How did they come across your desk such as the one that you have before you? A. Yes. D. How did they come across your desk such as the one that you have before you? A. Yes. D. How did they come across your desk such as the one that you have before you? A. Yes. D. How did they come across your desk such as the one that you have achecked attached to the bill and an and nevelope for me to mail out. D. Ware there times where it didn't happen, did you e		•			The state of the s
Page 42 1 of the check? 2 A. If I had one, yes. 3 Q. If you didn't have one, how would you know how to attribute it or characterize it or categorize it in QuickBooks? 4 A. I would ask Barry or get the register. 7 Q. So, hypothetically, let's say Barry doesn't give you any information about a check that's been paid out and you notice, hey, we're off by \$88. Oh, is it check 9289? You would go ask Barry, "What's this for? I can't figure it out"? 12 A. Yes. Or I'd check the register. 13 Q. So with respect to 1, you've never seen that before then? 14 A. I don't recall seeing that. 16 Q. You don't have any specific recollection at this time? 17 A. I don't. 18 Q. How about with respect to Exhibit 2? 19 MR. WARREN: She's already answered. Go ahead. 20 Q. With respect to both — actually, with respect to game across your desk? 4 Q. How did they come across your desk? 4 A. Yes. 9 How did they come across your desk? 4 A. Yes. 9 How did they come across your desk? 4 A. Yes. 9 How did they come across your desk? 4 A. He, Barry, would have a checked attached to the bill and an envelope for me to mail out. 7 Q. Did that happen every month? 8 A. Most. 9 Un the months that it didn't happen, did you ever ask him whether he needed to pay or anything? 11 A. No. 12 Q. Were there times where it didn't happen; in other words, you didn't receive a check to mail out and yet you would notice it on the account? 18 A. I don't. 19 Q. How often did you notice it on the corporation's checking account? 19 Q. How often did you notice it on the corporation's checking account? 19 Q. Key, One last question regarding Exhibit 3. That internet sash cable bill was not for the firm's internet or cable; correct? 20 Q. With the espect to both — actually, with respect to game across your desk? 21 A. No. 22 Q. Was there a separate internet or cable bill that the firm had?	1.1.11111111111111111111111111111111111				
Page 42 1 of the check? 2 A. If I had one, yes. 3 Q. If you didn't have one, how would you know how to attribute it or characterize it or categorize it in QuickBooks? 4 A. I would ask Barry or get the register. 5 Q. So, hypothetically, let's say Barry doesn't give you any information about a check that's been paid out and you notice, hey, we're off by \$88. Oh, is it check 10 9289? You would go ask Barry, "What's this for? I can't figure it out"? 11 can't figure it out"? 12 A. Yes. Or I'd check the register. 13 Q. So with respect to 1, you've never seen that before then? 14 Li don't recall seeing that. 16 Q. You don't have any specific recollection at this time? 17 A. I don't. 18 Q. How about with respect to Exhibit 2? 19 MR. WARREN: She's already answered. Go ahead. 20 ahead. 21 A. No. 22 BY MR. CAMARGO: 23 Q. With respect to both — actually, with respect to Exhibit 2, there's handwriting on that. Do you 1 Q. Did cable/internet bills regularly come across your desk? 2 desk such as the one that you have before you? 3 A. Yes. 4 Q. How did they come across your desk? 4 He, Barry, would have a checked attached to the bill and an envelope for me to mail out. 7 Q. Did that happen every month? 8 A. Most. 9 Un the months that it didn't happen, did you ever ask him whether he needed to pay or anything? 11 A. No. 12 Were there times where it didn't happen; in other words, you didn't receive a check to mail out and yet you would notice it on the account? 14 A. Yeah. 15 A. Yeah. 16 Q. How often did you notice it on the corporation's checking account? 17 A. I don't. 18 Q. How about with respect to Exhibit 2? 19 MR. CAMARGO: 20 A. No. 21 Intermet sish cable bill was not for the firm's intermet or cable; correct? 22 A. No. 23 Q. Was there a separate intermet or cable bill that the firm had?	1	and the second s	1		Service
1 Of the check? 2 A. If I had one, yes. 3 Q. If you didn't have one, how would you know how to attribute it or characterize it or categorize it in QuickBooks? 6 A. I would ask Barry or get the register. 7 Q. So, hypothetically, let's say Barry doesn't give you any information about a check that's been paid out and you notice, hey, we're off by \$88. Oh, is it check 10 9289? You would go ask Barry, "What's this for? I can't figure it out"? 11 can't figure it out"? 12 A. Yes. Or I'd check the register. 13 Q. So with respect to 1, you've never seen that before then? 14 then? 15 A. I don't recall seeing that. 16 Q. You don't have any specific recollection at this time? 17 A. I don't. 18 Q. How about with respect to Exhibit 2? 19 MR. WARREN: She's already answered. Go ahead. 20 ahead. 21 A. No. 22 BY MR. CAMARGO: 23 Q. With respect to both — actually, with respect to 24 Exhibit 2, there's handwriting on that. Do you 1 Q. Did cable/internet bills regularly come across your desk you' desk such as the one that you have before you? 24 A. Yes. 2 How did they come across your desk? 3 A. Yes. 4 Q. How did they come across your desk? 4 Hey Barry, would have a checked attached to the bill and an envelope for me to mail out. 7 Q. How did they come across your desk? 4 Hey Barry, would have a checked attached to the bill and an envelope for me to mail out. 7 Q. How did they come across your desk? 8 A. Hey Barry, would have a checked attached to the bill and an envelope for me to mail out. 9 Q. In the months that it didn't happen, did you ever ask him whether he needed to pay or anything? 11 A. No. 12 Q. Were there times where it didn't happen; in other words, you didn't receive a check to mail out and yet you would notice it on the account? 14 A. Yeah. 16 Q. How about with respect to Exhibit 2? 17 A. I don't recall seeing that. 18 A. It was monthly. 19 Q. Okay. One last question regarding Exhibit 3. That internet slash cable bill was not for the firm's internet slash cable bill that the firm had?	25 Q. Conect. Would you	dien closs verry trial vient copy			
desk such as the one that you have before you? A. If I had one, yes. Of If you didn't have one, how would you know how to attribute it or characterize it or categorize it in QuickBooks? A. I would ask Barry or get the register. Of So, hypothetically, let's say Barry doesn't give you any information about a check that's been paid out and you notice, hey, we're off by \$88. Oh, is it check 9289? You would go ask Barry, "What's this for? I can't figure it out"? A. Yes. Or I'd check the register. Of So with respect to 1, you've never seen that before then? A. I don't recall seeing that. Of You don't have any specific recollection at this time? A. I don't. Of How about with respect to Exhibit 2? MR. WARREN: She's already answered. Go ahead. A. No. Of War there is an one that you have before you? A. Yes. Hew did they come across your desk? A. He, Barry, would have a checked attached to the bill and an envelope for me to mail out. Of Did that happen every month? A. Most. Of Whether he needed to pay or anything? A. No. Of Were there times where it didn't happen, in other words, you didn't receive a check to mail out and yet you would notice it on the account? A. Yeah. How often did you notice it on the corporation's checking account? A. It was monthly. Of Ckay. One last question regarding Exhibit 3. That internet slash cable bill was not for the firm's internet slash cable bill was not for the firm's internet slash cable bill was not for the firm's internet slash cable bill was not for the firm's internet slash cable bill was not for the firm's internet slash cable bill was not for the firm's internet slash cable bill was not for the firm's internet slash cable bill that the firm had?		Page 42		Page 4	4
3 Q. If you didn't have one, how would you know how to attribute it or characterize it or categorize it in QuickBooks? 6 A. I would ask Barry or get the register. 7 Q. So, hypothetically, let's say Barry doesn't give you any information about a check that's been paid out and you notice, hey, we're off by \$8. Oh, is it check 9289? You would go ask Barry, "What's this for? I can't figure it out"? 11 can't figure it out"? 12 A. Yes. Or I'd check the register. 13 Q. So with respect to 1, you've never seen that before then? 14 then? 15 A. I don't recall seeing that. 16 Q. You don't have any specific recollection at this time? 17 A. I don't. 18 Q. How about with respect to Exhibit 2? 19 MR. WARREN: She's already answered. Go ahead. 20 With respect to both — actually, with respect to attin the polition of the firm's linternet or cable; correct? 24 EY MR. CAMARGO: 25 Q. With respect to both — actually, with respect to Exhibit 2, there's handwriting on that. Do you 26 A. No. 27 G. How did they come across your desk? 4 Q. How did they come across your desk? 4 Q. How did they come across your desk? 4 Q. How did they come across your desk? 4 Q. How did they come across your desk? 4 Q. How did they come across your desk? 4 Q. How did they come across your desk? 4 Q. How did they come across your desk? 4 Q. How did they come across your desk? 5 A. He, Barry, would have a checked attached to the bill and an envelope for me to mail out. 7 Q. Did that happen every month? 8 A. Most. 9 Q. Were there times where it didn't happen, did you ever ask him whether he needed to pay or anything? 11 A. No. 12 Q. Were there times where it didn't happen, did you ever ask him whether he needed to pay or anything? 11 A. No. 12 Q. Were there times where it didn't happen, did you over ack him whether he needed to pay or anything? 14 A. No. 15 A. Veah. 16 Q. How often did you notice it on the corporation's checking account? 17 A. It was monthly. 18 A. It was monthly. 19 G. Okay. One last question regarding Exhibit 3. That internet or cable; cor	1 of the check?		1	Q. Did cable/internet bills regularly come across your	100
attribute it or characterize it or categorize it in QuickBooks? A. I would ask Barry or get the register. Our So, hypothetically, let's say Barry doesn't give you any information about a check that's been paid out and you notice, hey, we're off by \$88. Oh, is it check Our says You would go ask Barry, "What's this for? I can't figure it out"? A. Yes. Or I'd check the register. Our So with respect to 1, you've never seen that before then? A. I don't recall seeing that. Our You don't have any specific recollection at this time? A. I don't. A. I don't. A. I don't. Our don't have any specific recollection at this time? A. I don't. A. No. Our don't have any specific recollection at this time? A. I don't. A. No. Our don't have any specific recollection at this time? A. I don't. A. No. Our don't have any specific recollection at this time? A. I don't. A. No. Our don't have any specific recollection at this time? A. I don't. A. No. Our don't have any specific recollection at this time? A. I don't. A. No. Our don't have any specific recollection at this time? A. I don't. A. No. Our don't have any specific recollection at this time? A. I don't. A. No. Our don't have any specific recollection at this time? A. I don't. A. No. Our don't have any specific recollection at this time? A. I don't. A. No. Our don't have any specific recollection at this time? A. I don't. Our don't have any specific recollection at this time? Our don't have any specific recollection at this time? Our don't have any specific recollection at this time? A. I don't. Our don't have any specific recollection at this time? Our don't have any specific recollection at this time? Our don't have any specific recollection at this time? Our don't have any specific recollection at this time? Our don't have any specific recollection at this time? Our don't have any specific recollection at this time? Our don't have any specific recollection at this time? Our don't have any specific recollection at this time?	2 A. If I had one, ye	S	.5	desk such as the one that you have before you?	
attribute it or characterize it or categorize it in QuickBooks? A. I would ask Barry or get the register. Q. So, hypothetically, let's say Barry doesn't give you any information about a check that's been paid out and you notice, hey, we're off by \$88. Oh, is it check 2898? You would go ask Barry, "What's this for? I can't figure it out"? A. Yes. Or I'd check the register. So with respect to 1, you've never seen that before then? A. I don't recall seeing that. Q. You don't have any specific recollection at this time? A. I don't. A. He, Barry, would have a checked attached to the bill and an envelope for me to mail out. A. Most. 9 Q. In the months that it didn't happen, did you ever ask him whether he needed to pay or anything? 11 A. No. 12 Q. Were there times where it didn't happen; in other words, you didn't receive a check to mail cut and yet you would notice it on the account? 4 A. I don't recall seeing that. 16 Q. You don't have any specific recollection at this time? 17 A. I don't. 18 Q. How about with respect to Exhibit 2? MR. WARREN: She's already answered. Go ahead. 20 ahead. 21 A. No. 22 BY MR. CAMARGO: Q. With respect to both — actually, with respect to Exhibit 2, there's handwriting on that. Do you 4 Do was there a separate internet or cable bill that the firm had?	3 Q. If you didn't have	e one, how would you know how to	3 ,	A. Yes.	THE STATE OF
QuickBooks? A. I would ask Barry or get the register. Q. So, hypothetically, let's say Barry doesn't give you any information about a check that's been paid out and you notice, hey, we're off by \$88. Oh, is it check 10 9289? You would go ask Barry, "What's this for? I can't figure it out?" A. Yes, Or I'd check the register. Q. So with respect to 1, you've never seen that before then? A. I don't recall seeing that. Q. You don't have any specific recollection at this time? A. I don't. A. I don't. A. I don't. B. A. Warren: She's already answered. Go ahead. A. No. 20 Ware there times where it didn't happen; in other words, you didn't receive a check to mail out and yet you would notice it on the account? A. Yeah. C. In the months that it didn't happen, did you ever ask him whether he needed to pay or anything? L. A. No. Were there times where it didn't happen; in other words, you didn't receive a check to mail out and yet you would notice it on the account? A. Yeah. C. Were there times where it didn't happen; in other words, you didn't receive a check to mail out and yet you would notice it on the account? A. Yeah. C. Were there times where it didn't happen; in other words, you didn't receive a check to mail out and yet you would notice it on the account? A. Yeah. C. Were there times where it didn't happen; in other words, you didn't receive a check to mail out and yet you would notice it on the account? A. Yeah. C. Were there times where it didn't happen; in other words, you didn't receive a check to mail out and yet you would notice it on the account? A. Yeah. C. O. How often did you notice it on the corporation's checking account? A. It was monthly. C. O. Was there a separate internet or cable bill that the firm had?			4 (Q. How did they come across your desk?	
7 Q. So, hypothetically, let's say Barry doesn't give you any information about a check that's been paid out and you notice, hey, we're off by \$88. Oh, is it check 10 9289? You would go ask Barry, "What's this for? I can't figure it out"? 11 can't figure it out"? 12 A. Yes. Or I'd check the register. 13 Q. So with respect to 1, you've never seen that before then? 14 then? 15 A. I don't recall seeing that. 16 Q. You don't have any specific recollection at this time? 17 A. I don't. 18 Q. How about with respect to Exhibit 2? 19 MR. WARREN: She's already answered. Go ahead. 20 ahead. 21 A. No. 22 BY MR. CAMARGO: 23 Q. With respect to both — actually, with respect to Exhibit 2, there's handwriting on that. Do you 7 Q. Did that happen every month? 8 A. Most. 9 Q. In the months that it didn't happen, did you ever ask him whether he needed to pay or anything? 11 A. No. 12 Q. Were there times where it didn't happen; in other words, you didn't receive a check to mail cut and yet you would notice it on the account? 14 Yeah. 15 A. Yeah. 16 Q. How often did you notice it on the corporation's checking account? 17 A. It was monthly. 19 MR. WARREN: She's already answered. Go internet slash cable bill was not for the firm's internet or cable; correct? 20 Was there a separate internet or cable bill that the Exhibit 2, there's handwriting on that. Do you 7 Q. Did that happen every month? 8 A. Most. 9 Q. In the months that it didn't happen, did you ever ask him whether he needed to pay or anything? 11 A. No. 12 Q. Were there times where it didn't happen; in other words, you didn't receive a check to mail cut and yet you would notice it on the account? 14 Yeah. 15 A. Yeah. 16 Q. How often did you notice it on the corporation's checking account? 17 A. It was monthly. 18 A. It was monthly. 19 Q. Okay. One last question regarding Exhibit 3. That internet slash cable bill was not for the firm's internet or cable; correct? 18 A. No. 19 Q. Was there a separate internet or cable bill that the firm had?	1		5 4	A. He, Barry, would have a checked attached to the bil	1
7 Q. So, hypothetically, let's say Barry doesn't give you any information about a check that's been paid out and you notice, hey, we're off by \$88. Oh, is it check 10 9289? You would go ask Barry, "What's this for? I can't figure it out"? 11 can't figure it out"? 12 A. Yes. Or I'd check the register. 13 Q. So with respect to 1, you've never seen that before then? 14 then? 15 A. I don't recall seeing that. 16 Q. You don't have any specific recollection at this time? 17 A. I don't. 18 Q. How about with respect to Exhibit 2? 19 Q. Were there times where it didn't happen; in other words, you didn't receive a check to mail cut and yet you would notice it on the account? 16 Q. How about with respect to Exhibit 2? 17 A. I don't. 18 Q. How about with respect to Exhibit 2? 19 MR. WARREN: She's already answered. Go 20 ahead. 21 A. No. 22 BY MR. CAMARGO: 23 Q. With respect to both — actually, with respect to Exhibit 2, there's handwriting on that. Do you 24 firm had?	6 A. I would ask Bar	ry or get the register.	6.	and an envelope for me to mail out.	
any information about a check that's been paid out and you notice, hey, we're off by \$88. Oh, is it check you notice, hey, we're off by \$88. Oh, is it check 289? You would go ask Barry, "What's this for? I can't figure it out"? A. Yes. Or I'd check the register. O. So with respect to 1, you've never seen that before then? A. I don't recall seeing that. O. You don't have any specific recollection at this time? A. I don't. A. I don't. MR. WARREN: She's already answered. Go ahead. A. No. With respect to both — actually, with respect to exhibit 2, there's handwriting on that. Do you By MR. CAMARGO: O. In the months that it didn't happen, did you ever ask him whether he needed to pay or anything? In the months that it didn't happen, did you ever ask him whether he needed to pay or anything? In the months that it didn't happen, did you ever ask him whether he needed to pay or anything? In the months that it didn't happen, did you ever ask him whether he needed to pay or anything? In the months that it didn't happen, did you ever ask him whether he needed to pay or anything? In the months that it didn't happen, did you ever ask him whether he needed to pay or anything? In the months that it didn't happen, did you ever ask him whether he needed to pay or anything? In the months that it didn't happen, did you ever ask him whether he needed to pay or anything? In the months that it didn't happen, did you ever ask him whether he needed to pay or anything? In the months that it didn't happen, did you ever ask him whether he needed to pay or anything? In the months that it didn't happen, did you ever ask him whether he needed to pay or anything? In the months that it didn't happen, did you ever ask him whether he needed to pay or anything? In the months that it didn't happen; in other words, you didn't receive a check to mail out and yet you would notice it on the corontal any out			7 (Q. Did that happen every month?	
you notice, hey, we're off by \$88. Oh, is it check 10 9289? You would go ask Barry, "What's this for? I 11 can't figure it out"? 12 A. Yes. Or I'd check the register. 13 Q. So with respect to 1, you've never seen that before then? 14 then? 15 A. I don't recall seeing that. 16 Q. You don't have any specific recollection at this time? 17 A. I don't. 18 Q. How about with respect to Exhibit 2? 19 MR. WARREN: She's already answered. Go ahead. 20 ahead. 21 A. No. 21 Internet or cable; correct? 22 BY MR. CAMARGO: 23 Q. With respect to both — actually, with respect to Exhibit 2, there's handwriting on that. Do you 9 Q. In the months that it didn't happen, did you ever ask him whether he needed to pay or anything? 10 him whether he needed to pay or anything? 11 A. No. 12 Q. Were there times where it didn't happen; in other words, you didn't receive a check to mail out and yet you would notice it on the account? 14 Yeah. 15 A. Yeah. 16 Q. How often did you notice it on the corporation's checking account? 17 checking account? 18 A. It was monthly. 19 Q. Okay. One last question regarding Exhibit 3. That internet or cable bill was not for the firm's internet or cable; correct? 20 With respect to both — actually, with respect to 23 Q. Was there a separate internet or cable bill that the firm had?			8 4	A. Most.	
10 9289? You would go ask Barry, "What's this for? I 11 can't figure it out"? 12 A. Yes. Or I'd check the register. 13 Q. So with respect to 1, you've never seen that before then? 14 then? 15 A. I don't recall seeing that. 16 Q. You don't have any specific recollection at this time? 17 A. I don't. 18 Q. How about with respect to Exhibit 2? 19 MR. WARREN: She's already answered. Go ahead. 20 ahead. 21 A. No. 22 BY MR. CAMARGO: 23 Q. With respect to both — actually, with respect to Exhibit 2, there's handwriting on that. Do you 10 him whether he needed to pay or anything? 11 A. No. 12 Q. Were there times where it didn't happen; in other words, you didn't receive a check to mail cut and yet you would notice it on the account? 15 A. Yeah. 16 Q. How often did you notice it on the corporation's checking account? 17 checking account? 18 A. It was monthly. 20 linternet slash cable bill was not for the firm's internet slash cable bill was not for the firm's internet or cable; correct? 24 A. No. 25 Q. Was there a separate internet or cable bill that the firm had?	1	· · · · · · · · · · · · · · · · · · ·	9 (Q. In the months that it didn't happen, did you ever ask	
11 can't figure it out"? 12 A. Yes. Or I'd check the register. 13 Q. So with respect to 1, you've never seen that before then? 14 then? 15 A. I don't recall seeing that. 16 Q. You don't have any specific recollection at this time? 17 A. I don't. 18 Q. How about with respect to Exhibit 2? 19 MR. WARREN: She's already answered. Go 20 ahead. 21 A. No. 21 Internet or cable bill was not for the firm's internet or cable bill that the Exhibit 2, there's handwriting on that. Do you 11 A. No. 12 Q. Were there times where it didn't happen; in other words, you didn't receive a check to mail out and yet you would notice it on the account? 14 Yeah. 15 A. Yeah. 16 Q. How often did you notice it on the corporation's checking account? 17 checking account? 18 A. It was monthly. 20 Okay. One last question regarding Exhibit 3. That internet or cable bill was not for the firm's internet or cable; correct? 21 A. No. 22 BY MR. CAMARGO: 23 Q. With respect to both — actually, with respect to 24 Exhibit 2, there's handwriting on that. Do you 24 Firm had?			10	him whether he needed to pay or anything?	100
12 A. Yes. Or I'd check the register. 13 Q. So with respect to 1, you've never seen that before 14 then? 15 A. I don't recall seeing that. 16 Q. You don't have any specific recollection at this time? 17 A. I don't. 18 Q. How about with respect to Exhibit 2? 19 MR. WARREN: She's already answered. Go 20 ahead. 21 A. No. 22 BY MR. CAMARGO: 23 Q. With respect to both — actually, with respect to 24 Exhibit 2, there's handwriting on that. Do you 24 Firm had? 29 Were there times where it didn't happen; in other 29 words, you didn't receive a check to mail out and yet 20 words, you didn't receive a check to mail out and yet 21 A. Yeah. 25 A. Yeah. 26 Q. How often did you notice it on the corporation's 27 checking account? 28 A. It was monthly. 29 Q. Okay. One last question regarding Exhibit 3. That 20 internet slash cable bill was not for the firm's 20 internet or cable; correct? 21 A. No. 22 BY MR. CAMARGO: 23 Q. With respect to both — actually, with respect to 24 Exhibit 2, there's handwriting on that. Do you 24 Firm had?			11 A	A. No.	ESECUTIVE SECUTIVE SE
13 Q. So with respect to 1, you've never seen that before then? 14 then? 15 A. I don't recall seeing that. 16 Q. You don't have any specific recollection at this time? 17 A. I don't. 18 Q. How about with respect to Exhibit 2? 19 MR. WARREN: She's already answered. Go 20 ahead. 21 A. No. 21 Internet or cable; correct? 22 BY MR. CAMARGO: 23 Q. With respect to both — actually, with respect to Exhibit 2, there's handwriting on that. Do you 24 Firm had?		•	12 Q	Q. Were there times where it didn't happen; in other	366015
14 you would notice it on the account? 15 A. I don't recall seeing that. 16 Q. You don't have any specific recollection at this time? 17 A. I don't. 18 Q. How about with respect to Exhibit 2? 19 MR. WARREN: She's already answered. Go 20 ahead. 21 A. No. 21 Internet or cable; correct? 22 BY MR. CAMARGO: 23 Q. With respect to both — actually, with respect to 24 Exhibit 2, there's handwriting on that. Do you 14 you would notice it on the account? 15 A. Yeah. 16 Q. How often did you notice it on the corporation's checking account? 17 checking account? 18 A. It was monthly. 19 Q. Okay. One last question regarding Exhibit 3. That internet or cable bill was not for the firm's internet or cable; correct? 20 Was there a separate internet or cable bill that the firm had?	1	=	1.3	words, you didn't receive a check to mail out and yet	
15 A. I don't recall seeing that. 16 Q. You don't have any specific recollection at this time? 17 A. I don't. 18 Q. How about with respect to Exhibit 2? 19 MR. WARREN: She's already answered. Go 20 ahead. 21 A. No. 21 Internet or cable; correct? 22 BY MR. CAMARGO: 23 Q. With respect to both — actually, with respect to 24 Exhibit 2, there's handwriting on that. Do you 25 A. Yeah. 26 How aften did you notice it on the corporation's checking account? 27 Checking account? 28 A. It was monthly. 29 Q. Okay. One last question regarding Exhibit 3. That internet or cable bill was not for the firm's internet or cable; correct? 20 Was there a separate internet or cable bill that the firm had?	,		14	you would notice it on the account?	e de la constante de la consta
16 Q. You don't have any specific recollection at this time? 17 A. I don't. 18 Q. How about with respect to Exhibit 2? 19 MR. WARREN: She's already answered. Go 20 ahead. 21 A. No. 21 A. No. 22 BY MR. CAMARGO: 23 Q. With respect to both — actually, with respect to 24 Exhibit 2, there's handwriting on that. Do you 26 D. How often did you notice it on the corporation's checking account? 17 checking account? 18 A. It was monthly. 19 Q. Okay. One last question regarding Exhibit 3. That internet slash cable bill was not for the firm's internet or cable; correct? 20 A. No. 21 Internet or cable; correct? 22 A. No. 23 Q. Was there a separate internet or cable bill that the firm had?	1	ing that.	15 A	A. Yeah.	
17 A. I don't. 18 Q. How about with respect to Exhibit 2? 19 MR. WARREN: She's already answered. Go 20 ahead. 21 A. No. 22 BY MR. CAMARGO: 23 Q. With respect to both — actually, with respect to 24 Exhibit 2, there's handwriting on that. Do you 27 checking account? 18 A. It was monthly. 29 Okay. One last question regarding Exhibit 3. That internet slash cable bill was not for the firm's internet or cable; correct? 24 Was there a separate internet or cable bill that the firm had?			16 Q	Q. How often did you notice it on the corporation's	
18 Q. How about with respect to Exhibit 2? 19 MR. WARREN: She's already answered. Go 20 ahead. 21 A. No. 22 BY MR. CAMARGO: 23 Q. With respect to both — actually, with respect to 24 Exhibit 2, there's handwriting on that. Do you 28 A. It was monthly. 19 Q. Okay. One last question regarding Exhibit 3. That internet siash cable bill was not for the firm's internet or cable; correct? 24 A. No. 25 Q. Was there a separate internet or cable bill that the firm had?	· ·	,	17	checking account?	entler:
19 MR. WARREN: She's already answered. Go 20 ahead. 21 A. No. 22 BY MR. CAMARGO: 23 Q. With respect to both — actually, with respect to 24 Exhibit 2, there's handwriting on that. Do you 29 Okay. One last question regarding Exhibit 3. That internet slash cable bill was not for the firm's internet or cable; correct? 20 Internet or cable; correct? 21 A. No. 22 BY MR. CAMARGO: 23 Q. Was there a separate internet or cable bill that the firm had?		snect to Exhibit 27		A. It was monthly.	guard.
20 ahead. 21 A. No. 21 Internet slash cable bill was not for the firm's internet or cable; correct? 22 BY MR. CAMARGO: 23 Q. With respect to both — actually, with respect to 24 Exhibit 2, there's handwriting on that. Do you 24 firm had?	1	•			
21 A. No. 22 BY MR. CAMARGO: 23 Q. With respect to both — actually, with respect to 24 Exhibit 2, there's handwriting on that. Do you 21 Internet or cable; correct? 22 A. No. 23 Q. Was there a separate internet or cable bill that the 24 Firm had?	1	er one a manage of the residue of	•	,	heter(
22 BY MR. CAMARGO: 23 Q. With respect to both — actually, with respect to 24 Exhibit 2, there's handwriting on that. Do you 24 Firm had?	1 .				
23 Q. With respect to both actually, with respect to 23 Q. Was there a separate internet or cable bill that the 24 Exhibit 2, there's handwriting on that. Do you 24 firm had?				<u>-</u>	
24 Exhibit 2, there's handwriting on that. Do you 24 firm had?		h		·· · · · · · · · · · · · · · · · · · ·	
mark to the control of the control o	23 A With warman to bad			go and all and a surpression of the state of	e e
2.3 recognize that harrows are a second and the sec			-	firm had?	
	2.4 Exhibit 2, there's ha	ndwriting on that. Do you	24		

•	Page 45	Page
1 Q. Wh	at was your understanding of what those bills were	you enter those?
2 for?	at was your angelstanding of visite chose unas viere	A. That was Let's see. What is that? I'm trying
3 A. Exh		remember. I think there's a category for cable/
4 Q. Yes.		internet service.
1	t was his home.	Q. Okay. Again, there's some handwriting on there. Do
1	t would have been Your understanding would be 6	you recognize that to be Barry's again?
1	s his home internet and/or cable bill?	A. Yes.
8 A. Yes.	a his statue inegrice actor at about a ini	Q. And it means the same thing to you that the last one
	nk you. I'm showing you what's been marked as	did, that a check was paid on that date?
1 .	it 4. Do you recognize that document?	A. Correct
1	that particular one, but I've seen documents like 11	Q. You can flip that one over. I'm going to show you
		what's marked as Exhibit Number 5. Have you ever see
		that document specifically or any document like that? A. I have not.
	,	
		Q. On the right corner there is again some writing. Is
16 A. That'.	1	that again Barry's writing?
		A. Yes, it is.
· 1		2. Reviewing this document I know you've never seen it
19 A. Yes.	19	before or don't have any specific recollection of
	would you come about seeing those?	that. Would you agree with me it appears to be a bill
1	usually these he would mail out but I would have 21	for the Detroit Jewish News?
	n the check register. 22 A	
1	you say that you would have them on the check 23 . Q	•
1 '	, in other words, you would find out about 24	the Detroit Jewish News?
25 them w	hen you were reviewing the monthly account 25 A	. No.
1		
1 stateme 2 A. Well, I	Page 46 nt? 1 Q. have to input the checks into a facsimile 2	Page 48 Did you ever see entries for news publications such as the Detroit Jewish News when going through the check
2 A. Well, I	nt? 1 Q. have to input the checks into a facsimile 2 n QuickBooks and so if I find myself off in the 3	Did you ever see entries for news publications such as the Detroit Jewish News when going through the check register or balancing the account?
2 A. Well, I 3 check in	nt? 1 Q. have to input the checks into a facsimile 2 n QuickBooks and so if I find myself off in the 3	Did you ever see entries for news publications such as the Detroit Jewish News when going through the check
2 A. Well, I 3 check in 4 sequence	nt? 1 Q. have to input the checks into a facsimile 2 n QuickBooks and so if I find myself off in the 3 ne, I would have to go get the register, and say 4 A.	Did you ever see entries for news publications such as the Detroit Jewish News when going through the check register or balancing the account?
2 A. Well, I 3 check in 4 sequence	have to input the checks into a facsimile 2 In QuickBooks and so if I find myself off in the 3 The idea of the register, and say the did he pay that, and that's how I would get 5 Q.	Did you ever see entries for news publications such as the Detroit Jewish News when going through the check register or balancing the account? Sometimes.
2 A. Well, I 3 check in 4 sequence 5 okay, wi 6 the infor	have to input the checks into a facsimile 2 I QuickBooks and so if I find myself off in the 3 I QuickBooks and so if I find myself off in the 3 I E., I would have to go get the register, and say 4 I hen did he pay that, and that's how I would get 5 I Q. Comation. 6	Did you ever see entries for news publications such as the Detroit Jewish News when going through the check register or balancing the account? Sometimes. How would you classify or characterize those in
2 A. Well, I 3 check in 4 sequence 5 okay, wi 6 the Infoi	have to input the checks into a facsimile 2 in QuickBooks and so if I find myself off in the 3 i.e., I would have to go get the register, and say 4 hen did he pay that, and that's how I would get 5 QuickBooks and so if I find myself off in the 3 can be a facsimile 5 QuickBooks and so if I find myself off in the 3 can be a facsimile 6	Did you ever see entries for news publications such as the Detroit Jewish News when going through the check register or balancing the account? Sometimes. How would you classify or characterize those in QuickBooks?
2 A. Well, I 3 check in 4 sequence 5 okay, wi 6 the infor 7 Q. That ma 8 let's say	have to input the checks into a facsimile 2 QuickBooks and so if I find myself off in the 3 Eq. I would have to go get the register, and say hen did he pay that, and that's how I would get 5 QuickBooks and so if I find myself off in the 3 Eq. I would have to go get the register, and say hen did he pay that, and that's how I would get 5 Eq. I would have to go get the register, and say hen did he pay that, and that's how I would get 6 Eq. I would have to go get the register, and say hen did he pay that, and that's how I would get 7 Eq. I would have to go get the register, and say hen did he pay that, and that's how I would get 7 Eq. I would have to go get the register, and say hen did he pay that, and that's how I would get 7 Eq. I would have to go get the register, and say hen did he pay that, and that's how I would get 8 Eq. I would have to go get the register, and say hen did he pay that, and that's how I would get 8 Eq. I would have to go get the register, and say hen did he pay that, and that's how I would get 8 Eq. I would have to go get the register, and say hen did he pay that, and that's how I would get 8 Eq. I would have to go get the register, and say hen did he pay that, and that's how I would get 8 Eq. I would have to go get the register, and say hen did he pay that he go get 1 Eq. I would have 2 Eq. I would have 3 Eq. I would ha	Did you ever see entries for news publications such as the Detroit Jewish News when going through the check register or balancing the account? Sometimes. How would you classify or characterize those in QuickBooks? Those would be dues and subscriptions, is the
2 A. Well, I 3 check in 4 sequence 5 okay, wi 6 the infor 7 Q. That ma 8 let's say y 9 the IT gu	have to input the checks into a facsimile 2 QuickBooks and so if I find myself off in the 3 E. I would have to go get the register, and say then did he pay that, and that's how I would get 5 C. rmation. 6 Res sense. So there might be a time where 7 A. you paid out checks number one and two for 8	Did you ever see entries for news publications such as the Detroit Jewish News when going through the check register or balancing the account? Sometimes. How would you classify or characterize those in QuickBooks? Those would be dues and subscriptions, is the category.
2 A. Well, I 3 check in 4 sequence 5 okay, wi 6 the infor 7 Q. That ma 8 let's say the IT gu 10 gives you	have to input the checks into a facsimile 2 QuickBooks and so if I find myself off in the 3 E. I would have to go get the register, and say then did he pay that, and that's how I would get 5 QuickBooks and so if I find myself off in the 3 E. I would have to go get the register, and say then did he pay that, and that's how I would get 5 E. I would have to go get the register, and say the condition of the conditi	Did you ever see entries for news publications such as the Detroit Jewish News when going through the check register or balancing the account? Sometimes. How would you classify or characterize those in QuickBooks? Those would be dues and subscriptions, is the category. How often did you see those come across?
2 A. Well, I 3 check in 4 sequence 5 okay, wi 6 the infor 7 Q. That ma 8 let's say the IT gu 10 gives you 11 paid, corr	have to input the checks into a facsimile 2 QuickBooks and so if I find myself off in the 3 E. I would have to go get the register, and say then did he pay that, and that's how I would get 5 QuickBooks and so if I find myself off in the 3 E. I would have to go get the register, and say then did he pay that, and that's how I would get 5 QuickBooks and so if I find myself off in the 3 E. I would have to go get the register, and say the condition of the condition	Did you ever see entries for news publications such as the Detroit Jewish News when going through the check register or balancing the account? Sometimes. How would you classify or characterize those in QuickBooks? Those would be dues and subscriptions, is the category. How often did you see those come across? Not very often.
2 A. Well, I 3 check in 4 sequence 5 okay, wi 6 the infor 7 Q. That ma 8 let's say the IT gu 10 gives you 11 paid, corr	have to input the checks into a facsimile QuickBooks and so if I find myself off in the Re, I would have to go get the register, and say then did he pay that, and that's how I would get remation. Rese sense. So there might be a time where the syou paid out checks number one and two for the syou paid out checks number one and two for the syou paid for something else; correct? Barry the sect, and then the next check you have is the syou're wondering where did number four the syou have is the syou're wondering where did number four the syou have is the syou're wondering where did number four the syou have is the syou have in the syou have is the syou have in th	Did you ever see entries for news publications such as the Detroit Jewish News when going through the check register or balancing the account? Sometimes. How would you classify or characterize those in QuickBooks? Those would be dues and subscriptions, is the category. How often did you see those come across? Not very often. Do you recall specifically the Detroit Jewish News,
2 A. Well, I 3 check in 4 sequence 5 okay, wi 6 the Infor 7 Q. That ma 8 let's say y 10 gives you 11 paid, corr 12 number fi	have to input the checks into a facsimile QuickBooks and so if I find myself off in the Re, I would have to go get the register, and say then did he pay that, and that's how I would get remation. Rese sense. So there might be a time where the syou paid out checks number one and two for the syou paid out checks number one and two for the syou paid for something else; correct? Barry the sect, and then the next check you have is the syou're wondering where did number four the syou have is the syou're wondering where did number four the syou have is the syou're wondering where did number four the syou have is the syou have in the syou have is the syou have in th	Did you ever see entries for news publications such as the Detroit Jewish News when going through the check register or balancing the account? Sometimes. How would you classify or characterize those in QuickBooks? Those would be dues and subscriptions, is the category. How often did you see those come across? Not very often. Do you recall specifically the Detroit Jewish News, not this particular bill, but that coming across?
2 A. Well, I 3 check in 4 sequence 5 okay, wi 6 the Inform 7 Q. That ma 8 let's say you 10 gives you 11 paid, corr 12 number fi 13 go; correct 14 A. Yes.	have to input the checks into a facsimile a QuickBooks and so if I find myself off in the ac, I would have to go get the register, and say then did he pay that, and that's how I would get remation. Ackes sense. So there might be a time where you paid out checks number one and two for a check for number three for something he ect, and then the next check you have is ve so you're wondering where did number four the contract of the contract o	Did you ever see entries for news publications such as the Detroit Jewish News when going through the check register or balancing the account? Sometimes. How would you classify or characterize those in QuickBooks? Those would be dues and subscriptions, is the category. How often did you see those come across? Not very often. Do you recall specifically the Detroit Jewish News, not this particular bill, but that coming across? No.
2 A. Well, I 3 check in 4 sequence 5 okay, wi 6 the Inform 7 Q. That ma 8 let's say you 10 gives you 11 paid, corr 12 number fi 13 go; correct 14 A. Yes.	have to input the checks into a facsimile: QuickBooks and so if I find myself off in the Re, I would have to go get the register, and say then did he pay that, and that's how I would get remation. Res sense. So there might be a time where you paid out checks number one and two for ay and for something else; correct? Barry a check for number three for something he ect, and then the next check you have is ve so you're wondering where did number four 12 13 A. 14 Q. you would check the check register?	Did you ever see entries for news publications such as the Detroit Jewish News when going through the check register or balancing the account? Sometimes. How would you classify or characterize those in QuickBooks? Those would be dues and subscriptions, is the category. How often did you see those come across? Not very often. Do you recall specifically the Detroit Jewish News, not this particular bill, but that coming across? No. What publications, if any, do you recall specifically?
2 A. Well, I 3 check in 4 sequence 5 okay, wi 6 the Inform 7 Q. That ma 8 let's say y 9 the IT gu 10 gives you 11 paid, corr 12 number fi 13 go; correct 14 A. Yes. 15 Q. And then 16 A. Correct.	have to input the checks into a facsimile: QuickBooks and so if I find myself off in the Re, I would have to go get the register, and say then did he pay that, and that's how I would get remation. Res sense. So there might be a time where you paid out checks number one and two for ay and for something else; correct? Barry a check for number three for something he ect, and then the next check you have is ve so you're wondering where did number four 12 13 A. 14 Q. you would check the check register?	Did you ever see entries for news publications such as the Detroit Jewish News when going through the check register or balancing the account? Sometimes. How would you classify or characterize those in QuickBooks? Those would be dues and subscriptions, is the category. How often did you see those come across? Not very often. Do you recall specifically the Detroit Jewish News, not this particular bill, but that coming across? No. What publications, if any, do you recall specifically? Lawyers Weekly, and once or twice the Free Press.
2 A. Well, I 3 check in 4 sequence 5 okay, wi 6 the Inform 7 Q. That ma 8 let's say y 9 the IT gu 10 gives you 11 paid, corr 12 number fi 13 go; correct 14 A. Yes. 15 Q. And then 16 A. Correct.	have to input the checks into a facsimile QuickBooks and so if I find myself off in the Re, I would have to go get the register, and say then did he pay that, and that's how I would get remation. Research So there might be a time where you paid out checks number one and two for ny and for something else; correct? Barry a check for number three for something he rect, and then the next check you have is ve so you're wondering where did number four 12 13 2 14 Q. 15 A. 16 Q. 17	Did you ever see entries for news publications such as the Detroit Jewish News when going through the check register or balancing the account? Sometimes. How would you classify or characterize those in QuickBooks? Those would be dues and subscriptions, is the category. How often did you see those come across? Not very often. Do you recall specifically the Detroit Jewish News, not this particular bill, but that coming across? No. What publications, if any, do you recall specifically? Lawyers Weekly, and once or twice the Free Press. Thank you.
2 A. Well, I 3 check in 4 sequenc 5 okay, wi 6 the Infor 7 Q. That ma 8 let's say y 9 the IT gu 10 gives you 11 paid, corr 12 number fi 13 go; correct 14 A. Yes. 15 Q. And then 16 A. Correct. 17 Q. And you i	have to input the checks into a facsimile QuickBooks and so if I find myself off in the Re, I would have to go get the register, and say then did he pay that, and that's how I would get remation. Research So there might be a time where you paid out checks number one and two for ny and for something else; correct? Barry a check for number three for something he rect, and then the next check you have is ve so you're wondering where did number four Research So there might be a time where you paid out checks number one and two for you paid out checks number one and two for you would check three for something he rect, and then the next check you have is you would check the check register? 12 13 A. 14 Q. 15 A. 16 Q. 17 Research Rescarch Research Research Research Research Research Research Rese	Did you ever see entries for news publications such as the Detroit Jewish News when going through the check register or balancing the account? Sometimes. How would you classify or characterize those in QuickBooks? Those would be dues and subscriptions, is the category. How often did you see those come across? Not very often. Do you recall specifically the Detroit Jewish News, not this particular bill, but that coming across? No. What publications, if any, do you recall specifically? Lawyers Weekly, and once or twice the Free Press. Thank you. MR. WARREN: Done.
2 A. Well, I 3 check in 4 sequence 5 okay, wi 6 the infor 7 Q. That ma 8 let's say y 9 the IT gu 10 gives you 11 paid, corr 12 number fi 13 go; correct 14 A. Yes. 15 Q. And then 16 A. Correct. 17 Q. And you i 18 register? 19 A. Yes.	have to input the checks into a facsimile QuickBooks and so if I find myself off in the Re, I would have to go get the register, and say then did he pay that, and that's how I would get remation. Research so there might be a time where you paid out checks number one and two for you and for something else; correct? Barry Reach and then the next check you have is Verso you're wondering where did number four the control of the check the check register? A. You would check the check register? Research so there might be a time where the check for number three for something he that the next check you have is You would check the check register? Research so there might be a time where the check for number one and two for you would check the check you have is Research so there might be a time where the check for number one and two for you would check the check you have is Research so the register of the check register? Research so the register of the check register of the	Did you ever see entries for news publications such as the Detroit Jewish News when going through the check register or balancing the account? Sometimes. How would you classify or characterize those in QuickBooks? Those would be dues and subscriptions, is the category. How often did you see those come across? Not very often. Do you recall specifically the Detroit Jewish News, not this particular bill, but that coming across? No. What publications, if any, do you recall specifically? Lawyers Weekly, and once or twice the Free Press. Thank you. MR. WARREN: Done. IR. CAMARGO: Filip that one over. I'm showing you what's been marked
2 A. Well, I 3 check in 4 sequence 5 okay, wi 6 the Infor 7 Q. That ma 8 let's say y 9 the IT gu 10 gives you 11 paid, corr 12 number fi 13 go; correct 14 A. Yes. 15 Q. And then 16 A. Correct. 17 Q. And you i 18 register? 19 A. Yes. 20 Q. What wou	have to input the checks into a facsimile QuickBooks and so if I find myself off in the Re, I would have to go get the register, and say then did he pay that, and that's how I would get remation. Rekes sense. So there might be a time where you paid out checks number one and two for you and for something else; correct? Barry I a check for number three for something he ect, and then the next check you have is you would check the check register? I A. You would check the check register? I A. I A	Did you ever see entries for news publications such as the Detroit Jewish News when going through the check register or balancing the account? Sometimes. How would you classify or characterize those in QuickBooks? Those would be dues and subscriptions, is the category. How often did you see those come across? Not very often. Do you recall specifically the Detroit Jewish News, not this particular bill, but that coming across? No. What publications, if any, do you recall specifically? Lawyers Weekly, and once or twice the Free Press. Thank you. MR. WARREN: Done. 18. CAMARGO:
2 A. Well, I 3 check in 4 sequence 5 okay, wi 6 the infor 7 Q. That ma 8 let's say y 9 the IT gu 10 gives you 11 paid, corr 12 number fi 13 go; correct 14 A. Yes. 15 Q. And then 16 A. Correct. 17 Q. And you i 18 register? 19 A. Yes. 20 Q. What wou 21 QuickBooks	have to input the checks into a facsimile 1 QuickBooks and so if I find myself off in the 2 quickBooks and so if I find myself off in the 3 quickBooks and so if I find myself off in the 2 quickBooks and so if I find myself off in the 3 quickBooks and so if I find myself off in the 3 quickBooks and so if I find myself off in the 4 A. 5 Q. 6 A. 8 quickBooks and so if I find myself off in the 7 quickBooks and so if I find myself off in the 8 quickBooks and so if I find myself off in the 9 Q. 10 A. 11 Q. 12 quickBooks and so if I find myself off in the 8 quickBooks and so if I find myself off in the 9 Q. 10 A. 11 Q. 12 quickBooks and so if I find myself off in the 8 quickBooks and so if I find myself off in the 9 Q. 10 A. 11 Q. 12 quickBooks and so if I find myself off in the 12 q. 13 A. 14 Q. 15 A. 16 Q. 17 q. 18 EY M. 19 Q. 20 q. 21 gid you enter those checks in under in 8 quickBooks and so if I find myself off in the 2 q. 2 q.	Did you ever see entries for news publications such as the Detroit Jewish News when going through the check register or balancing the account? Sometimes. How would you classify or characterize those in QuickBooks? Those would be dues and subscriptions, is the category. How often did you see those come across? Not very often. Do you recall specifically the Detroit Jewish News, not this particular bill, but that coming across? No. What publications, if any, do you recall specifically? Lawyers Weekly, and once or twice the Free Press. Thank you. MR. WARREN: Done. IR. CAMARGO: Filip that one over. I'm showing you what's been marked as Exhibit 6. Have you ever seen that document perfore?
2 A. Well, I 3 check in 4 sequence 5 okay, wi 6 the inform 7 Q. That ma 8 let's say y 9 the IT gu 10 gives you 11 paid, corr 12 number fi 13 go; correct 14 A. Yes. 15 Q. And then 16 A. Correct. 17 Q. And you i 18 register? 19 A. Yes. 20 Q. What wou 21 QuickBooks 22 A. Well, thei	have to input the checks into a facsimile QuickBooks and so if I find myself off in the Re, I would have to go get the register, and say then did he pay that, and that's how I would get remation. Reses sense. So there might be a time where you paid out checks number one and two for you and for something else; correct? Barry I a check for number three for something he ect, and then the next check you have is you would check the check register? Reserved wondering where did number four the pour would check the check register? Reserved would check the check register? Reserved would check the checks in under in the pour times a category for telephones.	Did you ever see entries for news publications such as the Detroit Jewish News when going through the check register or balancing the account? Sometimes. How would you classify or characterize those in QuickBooks? Those would be dues and subscriptions, is the category. How often did you see those come across? Not very often. Do you recall specifically the Detroit Jewish News, not this particular bill, but that coming across? No. What publications, if any, do you recall specifically? Lawyers Weekly, and once or twice the Free Press. Thank you. MR. WARREN: Done. IR. CAMARGO: Filip that one over. I'm showing you what's been marked as Exhibit 6. Have you ever seen that document perfore? No.
2 A. Well, I 3 check in 4 sequence 5 okay, wi 6 the Inform 7 Q. That ma 8 let's say you 10 gives you 11 paid, correct 12 number fi 13 go; correct 14 A. Yes. 15 Q. And then 16 A. Correct. 17 Q. And you i 18 register? 19 A. Yes. 20 Q. What wou 21 QuickBooks 22 A. Well, thei 23 Q. Did you er	have to input the checks into a facsimile QuickBooks and so if I find myself off in the Re, I would have to go get the register, and say then did he pay that, and that's how I would get remation. Rese sense. So there might be a time where you paid out checks number one and two for a pand for something else; correct? Barry and then the next check you have is reect, and then the next check you have is reect, and then the next check you have is reect, and then the next check you have is reect, and then the next check you have is reect, and then the next check register? A. 14 Q. 15 A. 16 Q. 17 18 BY M. 19 Q. 19 Q. 10 A. 11 Q. 12 I. 13 A. 14 Q. 15 A. 16 Q. 17 18 BY M. 19 Q. 19 Q. 10 A. 10 A. 11 Q. 12 I. 13 A. 14 Q. 15 A. 16 Q. 17 18 BY M. 19 Q. 10 A. 10 A. 11 Q. 12 I. 13 A. 14 Q. 15 A. 16 Q. 17 18 BY M. 19 Q. 10 A. 10 A. 11 Q. 12 I. 13 A. 14 Q. 15 A. 16 Q. 17 18 BY M. 19 Q. 10 A. 10 A. 11 Q. 12 I. 13 A. 14 Q. 15 A. 16 Q. 17 18 BY M. 19 Q. 10 A. 10 A. 11 Q. 12 I. 13 A. 14 Q. 15 A. 16 Q. 17 18 BY M. 19 Q. 20 I. 21 I. 22 A. 23 Q.	Did you ever see entries for news publications such as the Detroit Jewish News when going through the check register or balancing the account? Sometimes. How would you classify or characterize those in QuickBooks? Those would be dues and subscriptions, is the category. How often did you see those come across? Not very often. Do you recall specifically the Detroit Jewish News, not this particular bill, but that coming across? No. What publications, if any, do you recall specifically? Lawyers Weekly, and once or twice the Free Press. Thank you. MR. WARREN: Done. IR. CAMARGO: Filip that one over. I'm showing you what's been marked as Exhibit 6. Have you ever seen that document before? No. Do you recognize the handwriting on that document at
2 A. Well, I 3 check in 4 sequence 5 okay, wi 6 the Inform 7 Q. That ma 8 let's say you 10 gives you 11 paid, correct 12 number fi 13 go; correct 14 A. Yes. 15 Q. And then 16 A. Correct. 17 Q. And you i 18 register? 19 A. Yes. 20 Q. What wou 21 QuickBooks 22 A. Well, thei 23 Q. Did you er 24 A. Yes.	have to input the checks into a facsimile 1 QuickBooks and so if I find myself off in the 2 quickBooks and so if I find myself off in the 2 quickBooks and so if I find myself off in the 2 quickBooks and so if I find myself off in the 2 quickBooks and so if I find myself off in the 3 quickBooks and so if I find myself off in the 3 quickBooks and so if I find myself off in the 4 A. 4 A. 5 Q. 6 A. 8 quickBooks and so if I find myself off in the 2 quickBooks and so if I find myself off in the 4 A. 8 quickBooks and so if I find myself off in the 9 quickBooks and so if I find myself off in the 8 quickBooks and so if I find myself off in the 9 quickBooks and so if I find myself off in the 8 quickBooks and so if I find myself off in the 9 quickBooks and so if I find myself off in the 8 quickBooks and so if I find myself off in the 9 quickBooks and so if I find myself off in the 8 quickBooks and so if I find myself off in the 9 quickBooks and so if I find myself off in the 8 quickBooks and so if I find myself off in the 9 quickBooks and so if I find myself off in the 8 quickBooks and so if I find myself off in the 9 quickBooks and so if I find myself off in the 8 quickBooks and so if I find myself off in the 9 quickBooks and so if I find myself off in the 8 quickBooks and so if I find myself off in the 9 quickBooks and so if I find myself off in the 8 quickBooks and so if I find myself off in the 9 quickBooks and so if I find myself off in the 8 quickBooks and so if I find myself off in the 9 quickBooks and so if I find myself off in the 8 quickBooks and so if I find myself off in the 9 quickBooks and so if I find myself off in the 1 quickBooks and so if I find myself off in the 1 quickBooks and so if I find myself off in the 1 quickBooks and so if I find myself off in the 1 quickBooks and so if I find myself of	Did you ever see entries for news publications such as the Detroit Jewish News when going through the check register or balancing the account? Sometimes. How would you classify or characterize those in QuickBooks? Those would be dues and subscriptions, is the category. How often did you see those come across? Not very often. Do you recall specifically the Detroit Jewish News, not this particular bill, but that coming across? No. What publications, if any, do you recall specifically? Lawyers Weekly, and once or twice the Free Press. Thank you. MR. WARREN: Done. IR. CAMARGO: Filip that one over. I'm showing you what's been marked as Exhibit 6. Have you ever seen that document perfore? No.

1 Q. Does the document, eary part of it, make any acres to your 2 your 3 MR. WARREN: 11 object to the form of the question. Do you want to rephrase k? 5 FY NR. CAMARGO: Clay. 7 Q. Do you specifically see the name Marcia Serfman on the document? 9 A. Yes. 10 Q. Do you also specifically see 2020 vages column? 11 A. Yes. 12 Q. Do you use where it says \$20,000 in wages for ferrole serving a serving of sheethyll see a 2020 vages column? 13 Serfman? 14 A. Yes. 15 Q. Didy ou was where it says \$20,000 in wages for ferrole serving on the ferrole serving of sheethyll see a 2020 vages column? 16 A. Yes. 17 A. Yes. 18 Q. Didy ou was the checks or authorises a payroll company to write checks for her? 19 A. I did not. 10 Q. Galy, how do you know that Narris Serfman was neowhing reloges for ferrole serving or sheethyll see and the serving of sheethyll see and s		70 F1
you're guestion. Do you went to enthrose it? MR. CMARAGO: Closy. F. SY NR. CMARAGO: Closy. R. Ou you specifically see the name Narcia Suffman on that document? A. Yes. D. O. Do you specifically see the name Narcia Suffman on that document? A. Yes. D. O. Do you specifically see the name Narcia Suffman on that document? A. Yes. D. O. Do you see when it says \$20,000 in wages for Harcia Suffman on that document? A. Yes. D. O. Do you see when it says \$20,000 in wages for Harcia Suffman on the firm? A. Yes. D. Did you from that Marcia Suffman was receiving wages from the firm? A. Yes. D. Did you write the chacks or suthorize a payroll and one time, you know that she was being pathman? D. Ouley. Now did you know that she was being pathman? D. Ouley. Now did you know that she was being pathman? D. Ouley. Now did you know that she was being pathman? D. Ouley. Now did you know that she was being pathman? D. Ouley. Now did you know that she was being pathman? D. Ouley. Now did you know that she was being pathman? D. Ouley. Now did you know that she was being pathman? D. Ouley. Now did you know that she was being pathman? D. Ouley. Now did you know that she was being pathman? D. Ouley. Now did you know that she was being pathman? D. Ouley. The payroll commany calls to get the payroll and one time, you know, they saled mae employes by employee what the payroll is. Now, with regard to Barny. I. The would just say what he usually sets, and with Ray. Page 50 T. When he was here, I would say what Ray usually gets, and with Ray. Page 50 T. When he was here, I would say what Ray usually gets, and with Ray. Page 50 T. When he was the fair time she included Marcia in the payroll. D. Oyou know how long Marcia had been paid? A. I twas the first time she included Marcia in the payroll. D. Oyou know would yeve that twas probably were than a couple years. I tohink twas probably were than a couple years. I tohink twas post and the same than a couple years. I tohink twas post and the same than a couple	rage	
MR. MARKEN: Till object to the form of the 4 question. Do you want to reshrisse I?? MR. CAMARGO: BY MR. CAMARGO: A. I A. CAMARGO: BY MR. CAMARGO: A. Yes. Do you goe specifically see the name Marria Seriman on that document? A. Yes. Q. Do you see opecifically see a 2010 wopes column? A. Yes. Q. Do you see where it says \$20,000 in wages for Marcia Seriman was receiving ages from the firm? A. Yes. Do you see where it says \$20,000 in wages for Marcia Seriman was receiving ages from the firm? A. Yes. Company to while checks for the? A. I did not. A. I did not. A. Usel, the payroll company to while checks for the? A. Well, the payroll is. Now, with regard to Barry, I would for the payroll is. Now, with regard to Barry, I would for the see sked and Marcia, and with Rey. Page 50 I when he was here, I would say what Ray usually gets, a amounts there. Q. Clay, Why were you surprised? A. I was. Page 52 I was not pirty to nor authorized to give out specific a amounts there. Q. Okay. The first time she included Marcia in the payroll. A. I was. Page 52 I was not pirty to nor authorized to give out specific and amounts there. Q. Okay. Oy ou know how long Marcia had been paid? A. I was. A. I was. Q. Why were you surprised? A. I was. Page 52 I was not pirty to nor authorized to give out specific and more time, you know, when she asked and Marcia, and — Q. Okay. Oy ou know how long Marcia had been paid? A. I was. Q. Why were you surprised? A. I was. Q. Okay. Oy ou know how long Marcia had been paid? A. I was. Q. Okay. Oy ou know how oney— and if the asswer is no, I on't recall the exact time, but — Q. Okay. Oy ou know how what? A. Well, the payroll contact time she included Marcia in the payroll. Q. Oy oy know how long Marcia had been paid? A. I was. Q. Oy oy know how long Marcia had been paid? A. I was. Q. Oy oy know doty— and if the asswer is no, I on't recall the exact time, but — Q. Oy oy know doty— and if the asswer is no, I on't know that? A. Well, the present exact time,	1 Q. Does the document, any part of it, make any sense to	•
4		•
Service CAMARGO: Clary, Service CAMARGO: Clary, Service CAMARGO: Clary, Service CAMARGO: Clary, Service Campus perficially see the name Flancia Serfman on that document? Service Campus perficially see a 2010 wages column? Service Campus Cam	3 MR. WARREN: I'll object to the form of the	, (
6 SY NR, CAMARGO: 7 Q. Do you specifically see the name Nama Serfman on that document? 9 A. Yes. 10 Q. Do you also operficially see a 2010 wages column? 11 A. Yes. 12 Q. Do you see where it says \$20,000 in wages for Marcia 13 Serfman? 13 A. Yes. 14 A. Yes. 15 Q. Do you see where it says \$20,000 in wages for Marcia 13 Serfman? 16 Q. Do you see where it says \$20,000 in wages for Marcia 13 A. Yes. 17 A. Yes. 18 Q. Dol you write the checks or suthorities a paycell 14 MR, WARREN: 15 — I'm sorry. 19 Company to write checks for suthorities a paycell 19 MR, WARREN: Thank you. 110 Company to write checks for suthorities a paycell 19 MR, WARREN: Thank you. 111 Company to write checks for suthorities a paycell 19 MR, WARREN: Thank you. 112 Company to write the checks for suthorities a paycell 19 MR, WARREN: Thank you. 113 Company to write the checks for the paycell and one time, you know, they asked me employee by employee what the paycell is. Now, with regard to Barry, I would jout aray what he usually gets, and with Ray. 12 when he was here, I would say what Ray usually gets, and with Ray. 14 Why were you surprised when the asked and Marcia, and — So you know today when the was proposed? 15 Why were you surprised when the asked and Marcia, and — So you know thow, that Sine — do you know the wing Marcia had been paid? 19 A. Yes. 10 Do you know how long Marcia had been paid? 20 A. It was the first time she included Marcia in the payroll. 21 Low, that Sine — do you know thosy whether on not Marcia was paid every year that you were there? 22 A. Welf, when I was a poil of you know that was probably — I don't recall the exact time, but — 14 Control tow, that Sine — do you know that? 23 A. Yes. 24 Welf, when I was a poil of you were there? 25 A. Yes. 26 Colon, that Sine — do you know that? 27 A. It was the first time she included Marcia in the payroll. 28 A. Yes where there is not I was supprising to you were there? 29 A. I was the first time she included Marcia in the payroll. 29 Colon, that Sine — do you know that? 29 A. I w	4 question. Do you want to rephrase it?	**
7 Q. Do you specifically see the name Marcia Seffman on that document? 8 A Yes. 10 Q. Do you also specifically see a 2010 wages column? 11 A Yes. 12 Q. Do you see where it says \$20,000 in wages for Mercia 13 Seffman? 14 A Yes. 15 Q. Do you see where it says \$20,000 in wages for Mercia 16 Q. Do you see where it says \$20,000 in wages for Mercia 17 A Yes. 18 Q. Did you know that Narcia Seffman was receiving wages from the firm? 19 A. Yes. 10 Q. Did you write the checks or authorise a payroll company to write checks or authorise a payroll company to write checks for har? 10 Q. Okey. How did you know that she was being pold then? 11 A Yes. 12 Q. Okey. How did you know that she was being pold then? 13 anoutine, you know, they seled me employee by employees what the payroll is. Now, with regard to Barry, I would just say what he usually gets, and with Ray, 10 Q. Were you surprised? 11 wishen he was here, I would say what Ray usually gets, a mounts there. 12 Q. Were you surprised when she asked and Marcia, and— 13 A Yes. 14 Well, where you surprised? 15 When he was here, I would say what Ray usually gets, a mounts there. 16 Q. Were you surprised when she asked and Marcia, and— 17 A I was. 18 Q. Why were you surprised? 29 A. It was the first time she included Marcia in the payroll. 20 Q. Clay. Do you know hong Marcia had been paid? 21 A Yes. 22 A. I was. 23 Q. Clay. Do you know hong Marcia had been paid? 24 A. Yes. 25 A. O So you know hong Marcia had been paid? 26 A. I did not recall the exact time, but— 27 A. I was. 28 Q. Why were you surprised? 29 A. It was the first time she included Marcia in the payroll. 29 Clay. Do you know hong Marcia had been paid? 20 Do you know had you know that had were there? 21 A. Well, what it may an accompany the week that the was there. 29 Q. Clay. The first time you received one of those phone calls? 20 Q. Were you do know that she was not paid every year that you were there? 21 A. Well, when I was a mot included in it. They wouldn't and ask me	5 MR. CAMARGO: Okay.	
that document? 9 A. Yes. 10 Q. Do you also specifically see a 2010 wages column? 11 A. Yes. 12 Q. Do you also specifically see a 2010 wages column? 13 Saffman? 14 A. Yes. 15 Q. Do you see where it says \$20,000 in wages for Marcia 15 Saffman? 16 A. Yes. 17 A. Yes. 18 Q. Did you know that Narcia Saffman was receiving vages 19 find the fiftin? 10 A. Yes. 11 A. Yes. 12 Q. Did you write the checks or authorize a payroll 10 company to write checks or authorize a payroll 11 company to write checks or authorize a payroll 12 Q. Okisy. How did you know that she was being paid then? 13 A. Yes. 14 Q. Okisy. How did you know that she was being paid then? 15 Q. Welf, the payrell company calls to get the payroll and one time, you know, they asked me employee by employee what the payroll is. Now, with regard to Barny. I would just say what the ussally gets, and within Ray. 19 A. I was. 10 Q. Okisy. 11 When he was here, I would say what Ray usually gets, and within Ray. 11 A. Yes. 12 G. Were you surprised? 12 When he was here, I would say what Ray usually gets, and within the payroll. 13 A. Yes. 14 G. Okoy. 15 A. Yes. 16 MR. WARREN: This is just between us. Go ahlead. 21 BY MR. CAMARGO: 18 rephrate the question. 18 MR. WARREN: This is just between us. Go ahlead. 22 BY MR. CAMARGO: 20 Between us. Go ahlead. 23 Saffman as of today? 24 Saffman as of today? 25 A. Yes. 26 Why were you surprised when she asked and Marcia, and — 27 A. I was. 28 Q. Why were you surprised? 29 A. I was the first time she included Marcia in the payroll. 29 Q. Clay. The first time you received one of those photocals? 20 A. Wesh, what's fine — do you know doaly whether on rot Marcia was poing were year that I was there. 29 C. Okoy. Oko know that was was not paid every year that I was there. 29 C. Do you know to that he was not paid every year that I was there. 29 C. Do you know that was was not paid every year that I was there. 29 C. Do you know that was was not paid every year that I was there. 29 C. Do you k		
9 A. Yes. 10 Q. Do you also specifically see a 2010 wages column? 11 A. Yes. 12 Q. Do you see where it says \$20,000 in wages for Marcia 13 Seffment? 14 A. Yes. 15 Q. Did you know that Marcia Selfman was receiving wages 16 from the firm? 17 A. Yes. 18 Q. Did you write the checks or authorize a payroll 19 company to write checks for her? 19 Q. Didy you write the checks or authorize a payroll 20 A. I did not. 21 Q. Olday. How did you know that she was being paid then? 22 A. Well, the payroll company calls to get the payroll and 23 one time, you know, they asked me employee by amployee what the payroll is. Now, with regard to Barry, X. 25 would just say what he usually gets, and with Ray. 26 A. I divers. 27 A. I was. 28 Q. Olday. To nor authorized to give out specific amounts there. 39 A. I was the first time she included Marcia in the payroll. 30 Q. Olday. A I was the first time she included Marcia in the payroll. 31 A. Yes. 32 Q. Olday. The was paid every year that if was the first time she included Marcia in the payroll. 32 Q. Olday. The safe was not paid every year that I was the first time she was not paid every year that I was the first time she was not paid every year that I was the reach of paid and ask new what Harcia was going to get paid. 39 A. Less than five continuous years? 30 A. Yes. 31 A. Yes. 31 A. Yes. 31 A. Yes. 32 MR. CAMARGO: To make it a little more dear. 31 A. Well, the payroll is. Now, with regard to Barry, X. 32 Yes. 33 Degree of the case, and by that I mean, are there are what the payroll is the safe of payroll and the payroll. 30 A. I was the first time she included Marcia in the payroll. 31 A. Yes. 32 Q. Olday. The first time she included Marcia in the payroll. 32 Q. Olday. The first time she included Marcia in the payroll. 33 A. Yes. 34 Q. Olday. The first time she included Marcia in the payroll. 34 Q. Olday. Only know body — and if the answer is no, I don't know, that? 34 Q. Olday. Only our know that? 35 Q. And that's when you would have been surprising? 36 A. That's correct. 37 Q. And	7 Q. Do you specifically see the name Marcia Seifman on	
10 Q. Do you also specifically see a 2010 wages column? 11 A. Yes. 12 Q. Do you see where it says \$20,000 in wages for Marche 13 Seffman? 14 A. Yes. 15 Q. Did you know that Narcis Sefman was receiving wages 16 from the firm? 17 A. Yes. 18 Q. Did you know that Narcis Sefman was receiving wages 19 company to write checks or authorize a payroll 20 A. I did not. 21 Q. Ooky, Now did you know that she was being paid then? 22 A. Well, the payroll company calls to get the payroll and one time, you know, whith repart of Barry, I. 25 would just say what he usually gets, and with Ray. 26 Very you surprised? 27 A. I was. 28 Q. Why were you surprised? 29 A. I was. 39 Q. Why were you surprised? 30 A. I was. 39 Q. Why were you surprised? 30 A. I was. 30 Q. Why were you surprised? 31 A. Yes. 32 Q. Now she first time she included Marcia in the payrolls. A weshe first time she included Marcia in the payrolls. 30 Q. Why were you surprised? 31 A. Yes. 31 A. Yes. 32 Q. Was the first time she included Marcia in the payrolls. 31 Q. Ooky, Do you know today - and if the answer is no, I don't recall the exact time, but 31 Gon't recall the exact time, but 32 Clay. To you won't the exact time, but 33 Consecuration of those phone calls? 40 Q. Ooky, Do you know today 40 Q. Very you surprised? 41 Q. Ooky Do you know today 41 Q. Ooky Do you know today 41 A. No, She was not paid every year that I was there? 42 Q. So you do know that? 43 A. No, she was not paid every year that I was there. 44 Q. Ooky Do you know today 41 A. No, she was not paid every year that I was there. 45 Q. So you do know that? 46 A. No, She was not paid every year that I was there. 47 A. No, were there? 48 A. Well, when I wasWhen I was handling the payroll, it wasShe was not included in It. They wouldn't call lead ask me what Marcia was going to get paid. 49 A. Well, when I wasWhen I was handling the payroll, it wasShe was not included in It. They wouldn't call lead ask me what Marcia was going to get paid. 40 A. Well, when I wasShe was	8 that document?	
11 A. Yes. 12 Q. Do you see where it says \$20,000 in wages for Marcha 13 Seafman? 14 A. Yes. 15 Q. Did you know that Narcha Seafman was receiving wages 16 from the firm? 17 A. Yes. 18 Q. Did you write the checks or authorize a payroll 19 company to write checks for her? 20 A. I did not. 21 Q. Okay. Now did you know that she was being paid then? 22 A. Well, the payroll is. Now, with repard to Barry, I. would just say what he usually gets, and with Ray. 25 would just say what he usually gets, and with Ray. 26 when he was here, I would say what Ray usually gets, and with Ray. 27 A. I was. 28 Q. Okey. 29 A. I was. 29 A. I was. 20 Okey. Yes you surprised when she asked and Marcia? 3 amounts there. 4 Q. Okey. 5 A. So one time she asked and Marcia, and — 6 Q. Were you surprised when she asked and Marcia? 7 A. I was. 8 Q. Why were you surprised? 9 A. It was the first time she included Marcia in the payroll. 10 Q. Do you know how long Marcia had been paid? 11 Q. Do you know how long Marcia had been paid? 12 A. It's been a couple years. I think it was probably— 13 I don't recall the exact time, but— 14 MR. WARREN: Is — I'm sorry. 15 MR. CAMARGO: TI reprises the cjuestion. 16 dear. 17 MR. WARREN: This is just between us. Go 20 ahead. 21 Py MR. CAMARGO: 22 By MR. CAMARGO: 23 By MR. CAMARGO: 24 By MR. CAMARGO: 25 By MR. CAMARGO: 26 By MR. CAMARGO: 27 A. Yes. 28 By MR. CAMARGO: 29 A. Yes. 20 Seafman as of today? 21 A. Yes. 22 A. Yes. 23 A. Yes. 24 A. Yes. 25 A. Yes. 26 A. Yes. 27 A. Yes. 28 A. Yes. 29 A. Yes. 29 A. Yes. 29 A. Yes. 29 A. Yes. 20 Clear. The first time and better still in the payroll, in the first still in the case today? 20 A. Yes. 21 A. Yes. 22 A. Well, when I was should say whath a payroll duther. 23 A. Yes. 24 A. Yes. 25 A. Yes. 26 D. Do you know how long Marcia had been paid? 27 A. I was. 28 Clear. 29 A. Yes. 29 A. Yes. 29 Clear. The first time you received one of those phone calls? 29 A. Yes. 29 A. Yes. 29 A. Yes. 29 A. Yes. 29 Clear. The first time you received one of those phone calls? 29 A. Yes. 29 Cle		
12 Q. Do you see where it says \$20,000 in wages for Marcla 13 Seffman? 14 A. Yes. 15 Q. Did you know that Narcla Seffman was receiving wages from the firm? 16 Q. Did you write the checks or suchorize a payroll 17 A. Yes. 18 Q. Did you write the checks or suchorize a payroll 19 company to write checks for her? 20 A. I did not. 21 Q. Ooky. Now did you know that she was being paid then? 22 A. Well, the payroll company calls to get the payroll and one time, you know, writh regard to Barry, I. 23 would just say what he usually gets, and with Ray. 24 when he was here, I would say what Ray usually gets, would just say what he usually gets, and with Ray. 25 when he was here, I would say what Ray usually gets, 2 I was not privy to nor authorized to give out specific amounts there. 26 Q. Were you surprised when she asked and Marcla, and 27 Q. Ooky. 28 A. So one time she asked and Marcla, and 28 Q. Were you surprised when she asked and Marcla, and 29 Q. So it would, to the best of your recollection or idea, she has been paid a salary for somewhere less than the last five continuous years? 29 A. It was the first time she included Marcla in the payroll. 21 payroll. 22 Q. Do you know who long Marcla had been paid? 23 A. Yes. 3 Q. Well, were you surprised? 4 A. Yes. 4 A. Yes. 5 Q. Do you know whey and if the answer is no, I on't recall the exact time, but 29 A. It was the first time she included Marcla in the payroll. 21 payroll. 22 Q. How do you know what she was not paid every year that I was there. 3 Q. Colay. Do you know what year year that I was there. 4 Q. Ooky. Do you know what year year that I was there. 5 Q. How do you know that? 6 Q. How do you know that? 7 A. No. She was not paid every year that I was there. 7 A. That's correct. 7 A. Well, when I was When I was handlling the payroll, it was She was not folded in it. They wouldn't was When I was handlling the payroll, it was She was not folded in it. They wouldn't and sake me what Marcla was going to get paid. 4 A. Well, when I was	10 Q. Do you also specifically see a 2010 wages column?	
13 A. Yes. 14 A. Yes. 15 Q. Did you know that Marcia Selfman was racewing wages 16 from the firm? 17 A. Yes. 18 Q. Did you write the checks or suthorize a payroll 19 company to write checks for her? 20 A. I did not. 21 Q. Okay. How did you know that she was being paid then? 22 A. Well, the payroll company cells to get the payroll and one time, you know, they asked me employee by employees what the payroll is. Now, with regard to Barry, I 25 would just say what he usually gets, and with Ray. 25 would just say what he usually gets, and with Ray. 26 Q. Cay. Okay. How did you know that Selfwan and Pager SO 27 when five was here, I would say what Ray usually gets, amounts there. 28 Q. Were you surprised when she asked and Marcia, and		•
14 A. Yes. 15 Q. Did you know that Marcia Selfman was racewing wages 16 from the firm? 17 A. Yes. 18 Q. Did you write checks or authorize a payroll 19 company to write checks for her? 19 A. Yes. 10 Q. Okay. How dd you know that she was being paid then? 21 A. I did not. 22 A. I did not. 23 one time, you know, they asked me employee by employees that the payroll is. Now, with reagand to Barry, I would just say what he usually gets, and with Ray. 25 when he was here, I would say what Ray usually gets, I was not privy to nor authorized to give out specific amounts there. 4 Q. Okay. 5 A. So one time she asked and Marcia, and		
15 Q. Did you know that Marcia Selfman was racelying wages from the firm? 17 A. Yes. 18 Q. Did you write the chacks or authorize a payroll 19 company to write checks for her? 19 company to write checks for her? 20 A. I did not. 21 Q. Okay. How did you know that she was being paid then? 22 A. Well, the payroll company calls to get the payroll and one time, you know, they asked me employee by employee what the payroll is. Now, with regard to Barry, I would just say what he usually gets, and with hav. 22 I was not privy to nor authorized to give out specific amounts there. 23 amounts there. 24 Were you surprised when she asked and Marcia, and - 25 A. So one time she asked and Marcia, and - 26 Q. Why were you surprised? 27 A. I was. 28 Q. Why were you surprised? 3 A. I was the first time she included Marcia in the payroll. 3 A. I'ves the first time she included Marcia in the payroll. 4 Q. Do you know how long Marcia had been paid? 5 A. O you know how long Marcia had been paid? 6 Q. Why were you surprised? 9 A. It was the first time she included Marcia in the payroll. 10 Q. Do you know how long Marcia had been paid? 11 Q. Do you know how long Marcia had been paid? 12 A. It's been a couple years. I think it was probably 14 Q. Okay. Do you know today and if the answer is no, I don't recall the exact time, but 19 Go Kay. Do you know that she was not paid every year that I was there? 10 A. No, she was not paid every year that I was there? 10 A. No, she was not paid every year that I was there? 11 A. No, she was not paid every year that I was there? 12 A. Well, when I was When I was handling the payroll, it was She was not included in it. They wouldn't to call and ask me what Marcia was going to get paid. 10 Correct. 11 G. Chiy, when I was When I was handling the payroll, it was She was not included in it. They wouldn't to call and ask me what Marcia was going to get paid.	• • • • • • • • • • • • • • • • • • • •	
16 from the firm? 17 A. Yes. 18 Q. Did you write the checks or authorize a payroll 19 company to write checks for her? 20 A. I did not. 21 Q. Okay. How did you know that she was being paid then? 22 A. Welf, the payroll is. Now, with regard to Barry, I 23 one time, you know, they asked me employee by employee what the payroll is. Now, with regard to Barry, I 25 would just say what he usually gets, and with Rary. 26 when he was here, I would say what Ray usually gets, 27 I was not privy to nor authorized to give out specific amounts there. 28 Q. Okay. 29 A. I was. 30 Q. Okay. 4 A. So one time she asked and Marcia, and	i ·	
17 A. Yes. 18 Q. Did you write the checks or authorize's payroll company to write checks for her? 20 A. I did not. 21 Q. Okay. How did you know that she was being paid then? 22 A. Well, the payroll company calls to get the payroll and one time, you know, they asked me employee by employee twent the payroll is. Now, with regard to Barry, I would just say what he usually gets, and with Ray. 22 what the payroll is. Now, with regard to Barry, I would just say what he usually gets, and with Ray. 23 when he was here, I would say what Ray usually gets, I was not privy to nor authorized to give out specific amounts there. 4 Q. Okay. 5 A. So one time she asked and Marcia, and 6 Q. Were you surprised when she asked and Marcia in the payroll. 9 A. I was. 9 Q. Why were you surprised? 9 A. I twas the first time shie included Marcia in the payroll. 10 Q. Do you know how long Marcia had been paid? 11 Q. Do you know how long Marcia had been paid? 12 A. It been a couple years. I think it was probably 13 I don't recall the exact time, but 14 Q. Okay. Do you know dody and if the answer is no, I don't know, that's fine do you know thoday whether or not Marcia was paid every year that I was there? 10 Q. So you do know that she was not paid every year that I was there? 10 A. No, she was not paid every year that I was there? 10 Q. How do you do know that? 11 A. No, she was not paid every year that I was there. 12 Q. How do you know that? 13 A. Well, when I was When I was handling the payroll, when I was When I was nandling the payroll, when I was When I was nandling the payroll, while was She was not included in it. They wouldn't was call and ask me what Marcia was going to get paid.		I i
18 Q Did you write the chacks or suthorize a payroll 19 company to write checks for her? 20 A. I did not. 21 Q. Okiy, How did you know that she was being paid then? 22 A. Well, the payroll company calls to get the payroll and one time, you know, they asked me employee by employee write the payroll is. Now, with regard to Barn, X would just say what he usually gets, and with Ray. 25 would just say what he usually gets, and with Ray. 26 Page 50 Page 50 Page 50 Page 50 Page 50 Page 50 1 when he was here, I would say what Ray usually gets, 2 I was not privy to nor authorized to give out specific amounts there. 3 amounts there. 4 Q. Okay. 5 A. So one time she asked and Marcia, and	, ,	
Company to write checks for her? A. I did not. 1. Q. Okay, How did you know that she was being paid then? 2. A. Well, the payroll company calls to get the payroll and one time, you know, they asked me employee by employee what the payroll is. Now, with regard to Barry, I would just say what he usually gets, and with Ray. 2. The which has been a couple years. I think it was probably— 1. Q. Okay, Do you know how long Marcia had been paid? 2. A. It was the first time she included Marcia in the payroll. 2. Q. Okay, Do you know how long Marcia had been paid? 2. A. It was the first time she included Marcia in the payroll. 3. A. It was the first time she included Marcia in the payroll. 4. Q. Okay, Do you know how long Marcia had been paid? 4. A. It was the first time she included Marcia in the payroll. 5. Q. Okay, Do you know today—and if the answer is no, I don't recall the exact time, but— 6. Q. Okay, Do you know today—and if the answer is no, I don't know, that's fine—do you know today whether or not Marcia was paid every year that I was there. 6. Q. Okay, Do you know today—and if the answer is no, I don't know, that's fine—do you know today whether or not Marcia was paid every year that I was there. 6. Q. Okay, Do you know today—and if the answer is no, I don't know, that's fine—do you know today—and if the answer is no, I would have been surprising to you because you didn't really see her around the office; correct? 4. No, she was not paid every year that I was there. 5. Q. Okay. Use you do know that? 5. Q. How do you know that? 6. Q. Well, when I was—When I was analling the payroll. 6. Q. Well, when I was—When I was analling the payroll. 7. A. Well, it would have been surprising to you wes because you didn't see her on a day-to-day basis working in the office? 8. Well, when I was—When I was analling the payroll. 9. Well, when I was—When I was analling the payroll. 9. Well when I was—When I was analling the payroll. 9. Well and dead. 9. Well when I was—When I was analling the payroll. 9	[·	
A. I did not. 20 A. I did not. 21 Q. Okay. How did you know that she was being paid then? 22 A. Well, the payroll company calls to get the payroll and one time, you know, they asked me employee by employee what the payroll is. Now, with regard to Barry, I would just say what he usually gets, and with Ray. 22 What the payroll is. Now, with regard to Barry, I would just say what he usually gets, and with Ray. 23 when he was here, I would say what Ray usually gets, I was not privy to nor authorized to give out specific amounts there. 4 Q. Okay. 5 A. So one time she asked and Marcia, and — 6 Q. Were you surprised when she asked and Marcia, and — 7 A. I was. 9 Q. Okay. The first time you learned she had been paid a salary was that first time you learned she had been paid a salary was that first time you received one of those phone calls? A. It was the first time she included Marcia in the payroll. 10 Q. Do you know how long Marcia had been paid? A. It's been a couple years. I think it was probably— 11 Q. Okay. Do you know how long Marcia had been paid? A. It's been a couple years. I think it was probably— 12 A. It's been a couple years. I think it was probably— 13 don't recall the exact time, you were there? 14 Q. Okay. Do you know today—and if the answer is no, I don't know, that's fine—do you know today whether or not Marcia was paid every year that you were there? 10 Q. So it would, to the best of your recollection or idea, she has been paid a salary for somewhere less than the last five continuous years? 4 A. Yes. 7 Q. Okay. The first time you learned she had been paid a salary was that first time you received one of those phone calls? A. Yes. 9 Q. And that's when you would have been surprised; correct? 10 Q. Yes, Well, I told them she's not—This is the first I've heard she's working. 11 Q. Okay. Do you know that's we should have been surprising? 12 Q. Well, why would it have been surprising? 13 A. No, she was not paid every year that you were there? 14 A. No, she was not paid every y	i	- 1
21 Q. Clázy. How did you know that she was being paid then? 22 A. Well, the payroll company calls to get the payroll and one time, you know, they saked me employee by employee what the payroll is. Now, with regard to Barry, I would just say what he usually gets, and with Ray. 25 would just say what he usually gets, and with Ray. 26 Page 50 A. Yes. 27 A. I was. Q. Okay. A. I was. Q. Why were you surprised when she asked and Marcia, and — Q. Were you surprised when she asked and Marcia in the payroll. Q. Do you know how long Marcia had been paid? A. It was the first time she included Marcia in the payroll. Q. Okay. Do you know how long Marcia had been paid? A. It's been a couple years. I think it was probably — I don't recall the exact time, but — 10 Clay. Do you know today — and if the answer is no; I don't know, that's fine — do you know today whether or not Marcia was paid every year that I was there. Q. Ox you were there? Q. No, she was not paid every year that I was there. Q. Ox you were there? Q. A. That's correct. Q. How do you know that? A. Well, when I was — When I was handling the payroll, the was — She was not included in it. They wouldn't call and ask me what Marcia was going to get paid. 21 BY MR. CAMARGO: 22 Is that still the case, and by that I mean, are there still a salary being still is shary being still is shary being still is salary being salary for somewhere less than the last five continuous years? 4 A. Yes. A. Yes. A. Yes. A. Yes. A. Yes. A. Well, thoth the mash of today? A. No. Well,		4
A Well, the payroll company calls to get the payroll and one time, you know, they asked me employee by employee what the payroll is. Now, with regard to Barry, I would just say what he usually gets, and with Ray, Page 50 Page 50 when he was here, I would say what Ray usually gets. I was not privy to nor authorized to give out specific amounts there. Q. Okay. A Yes. A So one time she asked and Marcia, and — Q. Were you surprised? A I was. Q. Why were you surprised? A I was the first time she included Marcia in the payroll. Q. Do you know how long Marcia had been paid? A It's been a couple years. I think it was probably — I don't recall the exact time, but — Q. Ckay. Do you know today — and if the answer is no, I don't know, that's fine — do you know today whether or not Marcia was paid every year that I was there. Q. Ckay. Do you know that's mo to paid every year that I was there or not Marcia was paid every year that I was there. Q. Okay. Okay. A That's correct. Q. How do you know that? A Mell, when I was not paid every year that I was there. Q. How do you know that? A Well, when I was not paid every year that I was there. Q. How do you know that? A Well, when I was not included in it. They wouldn't call and ask me what Marcia was going to get paid. A Well, when I was not included in it. They wouldn't call and ask me what Marcia was going to get paid. A Correct. Q. Well, when I was not included in it. They wouldn't call and ask me what Marcia was going to get paid. A Correct.		
one time, you know, they asked me employee by employee what the payroll is. Now, with regard to Barry, I would just say what he usually gets, and with Ray. Page 50 when he was here, I would say what Ray usually gets, I was not privy to nor authorized to give out specific amounts there. Q. Okay. A. So one time she asked and Marcia, and— Q. Were you surprised when she asked and Marcia in the payroll. Q. Why were you surprised? A. It was. Q. Why were you surprised? A. It was the first time she included Marcia in the payroll. Q. Okay. Do you know how long Marcia had been paid? A. It's been a couple years. I think it was probably— Idon't recall the exact time, but— Contact throw, that's fine—do you know today whether or not Marcia was paid every year that I was there? A. No, she was not paid every year that I was there? A. That's correct. Q. How do you know that she was not paid every year that I was there? A. That's correct. Q. How do you know that? A. That's correct. Q. How do you know that? A. Well, when I was - When I was handling the payroll, was — She was not included in it. They wouldn't call and ask me what Marcia was going to get paid. A. Well, when I was - When I was handling the payroll, and was paid every year that was — She was not included in it. They wouldn't call and ask me what Marcia was going to get paid. A. Well, when I was - When I was handling the payroll, and the payroll		- 1 · . · · · · · · · · · · · · · · · · ·
what the payroll is. Now, with regard to Barry, I yould just say what he usually gets, and with Ray. Page 50 when he was here, I would say what Ray usually gets, I was not privy to nor authorized to give out specific amounts there. Q. Okay. A. So one time she asked and Marcia, and — Q. Were you surprised when she asked and Marcia? A. I was. Q. Why were you surprised? A. I was. Q. Why were you surprised? A. I was the first time she included Marcia in the payroll. Q. Do you know how long Marcia had been paid? A. It's been a couple years. I think it was probably — I don't recall the exact time, but — Q. Okay. Do you know today — and if the answer is no, I don't know, that's fine — do you know today whether or not Marcia was paid every year that I was there? A. No, she was not paid every year that I was there? Q. So it would, to the best of your recollection or idea, she has been paid a salary for somewhere less than the last five continuous years? 4. A. Yes. 7. Q. Okay. A. Yes. 7. Q. Okay. The first time you fearned she had been paid a salary was that first time you received one of those phone calls? 10. A. Yes. 11. A. Yes. 12. A. Well, I told them she's not — This is the first I've heard she's working. 13. A. Well, I told them she's not — This is the first I've heard she's working. 14. Well, I told them she's not — This is the first I've heard she's working. 15. Q. Well, why would have been surprising to you because you didn't really see her around the office; correct? 16. Q. How do you know that? 17. A. No, she was not paid every year that I was there? 18. Q. How do you know that? 19. A. That's correct. 19. Q. How do you know that? 20. A. Well, when I was — When I was handling the payroll, and the was a soul included in it. They wouldn't call and ask me what Marcia was going to get paid. 29. The sorry. It may have been a poorty asked question. 20. Far for the reason it was surprising to you was because you didn't see her on a day-to-day basis working in the office? 21. A. Well, when I was — When I was ha		l lá
Page 50 Page 50 Page 50 Page 50 I was not privy to nor authorized to give out specific amounts there. Q. Okay. A. So one time she asked and Marcia, and Q. Were you surprised when she asked and Marcia in the payroil. Q. Do you know how long Marcia had been paid? A. It's been a couple years. I think it was probably I don't recall the exact time, but Q. Okay. Do you know today and if the answer is no, I don't recall the exact time, but Q. Okay. Do you know today and if the answer is no, I don't recall the exact time, but Q. Okay. Do you know today and if the answer is no, I don't recall the exact time, but Q. Okay. Do you know today and if the answer is no, I don't recall the exact time, but Q. Okay. Do you know today and if the answer is no, I don't recall the exact time, but Q. Okay. Do you know today and if the answer is no, I don't recall the exact time, but Q. Okay. Do you know today and if the answer is no, I don't recall the exact time, but Q. Okay. Do you know today and if the answer is no, I don't recall the exact time, but Q. Okay. Do you know today and if the answer is no, I don't recall the exact time, but Q. Okay. Do you know today and if the answer is no, I don't recall the exact time, but Q. Okay. Do you know today and if the answer is no, I don't recall the exact time, but Q. Okay. Do you know today and if the answer is no, I don't recall the exact time, but Q. Okay. Do you know today and if the answer is no, I don't recall the exact time, but Q. Okay. Do you know today and if the answer is no, I don't recall the exact time, but Q. Okay. Do you know today and if the answer is no, I don't recall the exact time, but Q. Okay. Do you know today and if the answer is no, I don't recall the exact time, but Q. Okay. Do you know today and if the answer is no, I don't recall the exact time, but Q. Okay. Do you know today and if the answer is no, I don't recall the exact time, but Q. Ok		I In
Page 50 1 when he was here, I would say what Ray usually gets. 2 I was not privy to nor authorized to give out specific 3 amounts there. 4 Q. Okay. 5 A. So one time she asked and Marcia, and 6 Q. Were you surprised when she asked and Marcia? 7 A. I was. 8 Q. Why were you surprised? 9 A. It was the first time she included Marcia in the payroll. 10 Q. Do you know how long Marcia had been paid? 11 Q. Okay. Do you know today - and if the answer is no, I don't recall the exact time, but 10 Goday. Do you know today - and if the answer is no, I don't recall the exact time, but 11 don't recall the exact time, but 12 A. No, she was not paid every year that you were there? 13 A. No, she was not paid every year that you were there? 14 A. No, she was not paid every year that you were there? 15 Q. So you do know that she was not paid every year that you were there? 16 Q. How do you know that? 17 A. No, it would not 18 Q. Well, when I wasWhen I was handling the payroll, when I wasWhen I was handling the payroll, when I wasShe was not included in it. They wouldn't call and ask me what Marcia was going to get paid. 1 Q. So it would, to the best of your recollection or idea, she has been paid a salary for somewhere less than the last five continuous years? 1 A. Yes. 2 Q. And that's an approximation? 4 A. Yes. 7 Q. Okay. The first time you learned she had been paid a salary for somewhere less than the last five continuous years? 4 A. Yes. 7 Q. Okay. The first time you learned she had been paid a salary for somewhere less than the last five continuous years? 4 A. Yes. 7 Q. Okay. The first time you learned she had been paid a salary for somewhere less than the last five continuous years? 4 A. Yes. 7 Q. Okay. The first time you learned she had been paid a salary for somewhere less than the last five continuous years? 4 A. Yes. 7 Q. Okay. The first time you learned she had been paid a salary for somewhere less than the last five continuous years? 4 A. Yes. 7 Q. Okay. The first time she vas we		_
when he was here, I would say what Ray usually gets. I was not privy to nor authorized to give out specific amounts there. Q Okay. A. So one time she asked and Marcia, and Q Were you surprised when she asked and Marda? A. I was. Q. Why were you surprised? A. It was the first time she included Marcia in the payroll. Q. Do you know how long Marcia had been paid? A. It's been a couple years. I think it was probably I don't recall the exact time, but Q Okay. Do you know today and if the answer is no, I don't know, that's fine do you know today whether or not Marcia was paid every year that I was there. Q. So it would, to the best of your recollection or idea, she has been paid a salary for somewhere less than the last five continuous years? A. Yes. Q. And that's an approximation? A. Yes. Q. Ckay. The first time you learned she had been paid a salary was that first time you received one of those phone calls? A. Yes. Q. And that's when you would have been surprised; correct? A. Well, I told them she's not This is the first I've heard she's working. D. In fact, it would have been surprising to you because you didn't really see her around the office; correct? A. No. D. Well, why would it have been surprising? A. No, it would not Q. I'm sorry. It may have been a poorly asked question. Part of the reason it was surprising to you was because you didn't see her on a day-to-day basis working in the office? A. Correct. A. Correct. A. Correct. A. Correct.	25 Would just say what he disdairy gets, and what harry.	
I was not privy to nor authorized to give out specific amounts there. Q. Okay. A. So one time she asked and Marcia, and Q. Were you surprised when she asked and Marcia? A. I was. Q. Why were you surprised? A. It was the first time she included Marcia in the payroll. Q. Do you know how long Marcia had been paid? A. It's been a couple years. I think it was probably I don't recall the exact time, but Q. Okay. Do you know today and if the answer is no, I don't know, that's fine do you know today whether or not Marcia was paid every year that you were there? A. No, she was not paid every year that I was there. Q. So you do know that she was not paid every year that you were there? Q. Well, when I was When I was handling the payroll, it was She was not included in it. They wouldn't Call and ask me what Marcia was going to get paid. A. Yes. Q. Okay. The first time you learned she had been paid a salary was that first time you received one of those phone calls? A. Yes. A. Well, I told them she's not This is the first I've heard she's working. In fact, it would have been surprising to you because you didn't really see her around the office; Correct? A. No, it would not C. I'm sorry. It may have been a poorly asked question. Part of the reason it was surprising to you was because you didn't see her on a day-to-day ba	Page :50	Page 52
she has been paid a salary for somewhere less than the last five continuous years? A. Yes. A. So one time she asked and Marcia, and Q. Were you surprised when she asked and Marcia? A. I was. Q. Why were you surprised? A. It was the first time she included Marcia in the payroll. Q. Do you know how long Marcia had been paid? A. It's been a couple years. I think it was probably I don't recall the exact time, but Q. Okay. Do you know today - and if the answer is no, I don't know, that's fine do you know today whether or not Marcia was paid every year that I was there? A. No, she was not paid every year that I was there. So you do know that she was not paid every year that I was there. A. That's correct. A. That's correct. A. Well, when I was When I was handling the payroll, it was She was not included in it. They wouldn't call and ask me what Marcia was going to get paid. A. Correct.	when he was here, I would say what Ray usually gets	. 1 Q. So it would, to the best of your recollection or idea,
amounts there. 4 Q. Okay. 5 A. So one time she asked and Marcia, and 6 Q. Were you surprised when she asked and Marcia? 7 A. I was. 8 Q. Why were you surprised? 9 A. It was the first time she included Marcia in the payroll. 10 Q. Do you know how long Marcia had been paid? 11 Q. Do you know how long Marcia had been paid? 12 A. It's been a couple years. I think it was probably 13 I don't recall the exact time, but 14 Q. Okay. Do you know today and if the answer is no, I don't know, that's fine do you know today whether or not Marcia was paid every year that you were there? 16 Q. So you do know that she was not paid every year that I was there. 18 Q. So you do know that she was not paid every year that I was there. 19 Q. How do you know that? 20 A. That's correct. 21 Q. How do you know that? 22 A. Well, when I was She was not included in it. They wouldn't call and ask me what Marcia was going to get paid. 23 I ast five continuous years? 4 A. Yes. 5 Q. And that's an approximation? 6 A. Yes. 7 Q. Okay. The first time you learned she had been paid a salary was that first time you received one of those phone calls? 10 A. Yes. 11 Q. And that's when you would have been surprised; correct? 12 A. Well, I told them she's not This is the first I've heard she's working. 13 A. Well, I told them she's working. 14 A. No. 15 Q. In fact, it would have been surprising? 16 A. No. 17 A. No. 18 Q. Well, why would it have been surprising? 19 A. No, it would not 20 Q. I'm sorry. It may have been a poorly asked question. 21 Part of the reason it was surprising to you was because you didn't see her on a day-to-day basis working in the office? 22 A. Correct. 23 A. Correct. 24 A. Correct.		
A. So one time she asked and Marcia, and — Q. Were you surprised when she asked and Marcia? A. I was. Q. Why were you surprised? A. It was the first time she included Marcia in the payroll. Q. Do you know how long Marcia had been paid? A. It's been a couple years. I think it was probably — I don't recall the exact time, but — Q. Okay. Do you know today — and if the answer is no, I don't know, that's fine — do you know today whether or not Marcia was paid every year that I was there. Q. So you do know that she was not paid every year that I was there. Q. So you do know that she was not paid every year that I was there. Q. A. That's correct. Q. How do you know that? A. Well, when I was — When I was handling the payroll, it was — She was not included in it. They wouldn't call and ask me what Marcia was going to get paid. A. Correct.		3 last five continuous years?
6 Q. Were you surprised when she asked and Marda? 7 A. I was. 8 Q. Why were you surprised? 9 A. It was the first time she included Marcia in the payroll. 10 payroll. 11 Q. Do you know how long Marcia had been paid? 12 A. It's been a couple years. I think it was probably— 13 I don't recall the exact time, but— 14 Q. Okay. Do you know today — and if the answer is no, I don't know, that's fine — do you know today whether or not Marcia was paid every year that I was there. 16 Q. So you do know that she was not paid every year that I was there. 17 A. No, she was not paid every year that I was there. 18 Q. So you do know that she was not paid every year that I was there. 19 A. That's correct. 10 Q. How do you know that? 21 A. Well, when I was — When I was handling the payroll, it was — She was not included in it. They wouldn't call and ask me what Marcia was going to get paid. 2 A. Correct. 3 A. Yes. 1 Q. Okay. The first time you learned she had been paid a salary was that first time you learned she had been paid a salary was that first time you learned she had been on those phone calls? 4 A. Yes. 1 Q. And that's when you would have been surprised; correct? 1 A. Well, I told them she's not — This is the first I've heard she's working. 1 D. A. Yes. 1 Q. And that's when you would have been surprising to you because you didn't really see her around the office; correct? 2 A. No. 2 Well, why would it have been surprising? 3 A. No. 3 Well, why would it have been a poorly asked question. 4 Part of the reason it was surprising to you was because you didn't see her on a day-to-day basis working in the office? 2 A. Correct. 3 A. Correct. 4 A. Correct. 4 A. Correct. 5 Q. Okay. The first time you learned she had been paid a salary was that first time you learned she had been paid a salary was that first live hear alls? 4 A. Well, I told them she's not — This is the first I've heard she's working. 5 Q. In fact, it would have been surprising? 6 A. No. 7 A. No. 7 A. No. 8 Q. Well, why would it have been a poorly asked	4 Q. Okay.	4 A. Yes.
7 Q. Okay. The first time you learned she had been paid a salary was that first time you received one of those phone calls? 10 payroll. 11 Q. Do you know how long Marcia had been paid? 12 A. It's been a couple years. I think it was probably— 13 I don't recall the exact time, but— 14 Q. Okay. Do you know today — and if the answer is no, I don't know, that's fine — do you know today whether or not Marcia was poid every year that you were there? 16 A. No, she was not paid every year that I was there. 17 A. No, she was not paid every year that I was there. 18 Q. So you do know that she was not paid every year that you were there? 19 A. That's correct. 10 Q. How do you know that? 11 Q. Okay. The first time you learned she had been paid a salary was that first time you learned she had been paid a salary was that first time you learned she had been paid a salary was that first time you learned she had been paid a salary was that first time you learned she had been paid a salary was that first time you learned she had been paid a salary was that first time you learned she had been paid a salary was that first time you learned she had been paid a salary was that first time you received one of those phone calls? 10 A. Yes. 11 Q. And that's when you would have been surprised; correct? 12 A. Well, I told them she's not — This is the first I've heard she's working. 15 Q. In fact, it would have been surprising to you because you didn't really see her around the office; orrect? 17 A. No. 18 Q. Well, why would it have been surprising? 19 A. No, it would not — 20 Q. I'm sorry. It may have been a poorly asked question. 21 Part of the reason it was surprising to you was because you didn't see her on a day-to-day basis working in the office? 22 A. Correct.	5 A. So one time she asked and Marcia, and	5 Q. And that's an approximation?
8 Salary was that first time you received one of those phone calls? 9 A. It was the first time she included Marcia in the payroll. 10 payroll. 11 Q. Do you know how long Marcia had been paid? 12 A. It's been a couple years. I think it was probably— 13 I don't recall the exact time, but— 14 Q. Okay. Do you know today—and if the answer is no, I don't know, that's fine—do you know today whether or not Marcia was paid every year that you were there? 16 Q. So you do know that she was not paid every year that I was there. 17 A. No, she was not paid every year that I was there. 18 Q. So you do know that she was not paid every year that you were there? 19 A. No, it would not— 20 A. That's correct. 21 Q. How do you know that? 22 A. Well, when I was — When I was handling the payroll, it was — She was not included in it. They wouldn't call and ask me what Marcia was going to get paid. 24 A. Correct. 26 Call-and ask me what Marcia was going to get paid. 27 A. Correct. 28 Salary was that first time you received one of those phone calls? 10 A. Yes. 11 Q. And that's when you would have been surprised; correct? 12 A. Well, I told them she's not—This is the first I've heard she's working. 13 A. Well, I told them she's not—This is the first I've heard she's working. 14 Well, would have been surprising to you because you didn't really see her around the office; correct? 15 Q. Well, why would it have been surprising? 16 A. No. 17 A. No. 18 C. Well, why would it have been a poorly asked question. 29 Part of the reason it was surprising to you was because you didn't see her on a day-to-day basis working in the office? 20 A. Correct. 21 A. Correct. 22 A. Correct.	6 Q. Were you surprised when she asked and Marcia?	6 A. Yes.
payroll. 10 Do you know how long Marcia had been paid? 11 Q. Do you know how long Marcia had been paid? 12 A. It's been a couple years. I think it was probably— 13 I don't recall the exact time, but— 14 Q. Okay. Do you know today—and if the answer is no, I 15 don't know, that's fine—do you know today whether 16 or not Marcia was paid every year that I was there. 17 A. No, she was not paid every year that I was there. 18 Q. So you'do know that she was not paid every year that 19 phone calls? 10 A. Yes. 11 Q. And that's when you would have been surprised; 12 correct? 13 A. Well, I told them she's not—This is the first I've heard she's working. 15 Q. In fact, it would have been surprising to you because you didn't really see her around the office; correct? 17 A. No. 18 Q. Well, why would it have been surprising? 19 A. No, it would not— 20 Q. I'm sorry. It may have been a poorly asked question. 21 Part of the reason it was surprising to you was because you didn't see her on a day-to-day basis working in the office? 22 and that's when you would have been surprised; 23 correct? 24 A. Correct.	7 A. Iwas.	7 Q. Okay. The first time you learned she had been paid a
payroll. Q. Do you know how long Marcia had been paid? A. It's been a couple years. I think it was probably I don't recall the exact time, but Q. Okay. Do you know today and if the answer is no, I don't know, that's fine do you know today whether or not Marcia was paid every year that you were there? A. No, she was not paid every year that I was there. Q. So you do know that she was not paid every year that you were there? A. That's correct. Q. How do you know that? A. Well, when I was When I was handling the payroll, it was She was not included in it. They wouldn't call and ask me what Marcia was going to get paid. 10 A. Yes. 11 Q. And that's when you would have been surprised; correct? 12 correct? 13 A. Well, I told them she's not This is the first I've heard she's working. 14 heard she's working. 15 Q. In fact, it would have been surprising to you because you didn't really see her around the office; correct? 17 A. No. 18 Q. Well, why would it have been surprising? 19 A. No, it would not 20 Q. I'm sorry. It may have been a poorly asked question. 21 Part of the reason it was surprising to you was because you didn't see her on a day-to-day basis working in the office? 22 working in the office? 23 working in the office?	8 Q. Why were you surprised?	8 salary was that first time you received one of those
11 Q. Do you know how long Marcia had been paid? A. It's been a couple years. I think it was probably I don't recall the exact time, but 14 Q. Okay. Do you know today and if the answer is no, I 15 don't know, that's fine do you know today whether 16 or not Marcia was paid every year that you were there? 17 A. No, she was not paid every year that I was there. 18 Q. So you do know that she was not paid every year that 19 you were there? 10 A. No, it would not 10 Q. How do you know that? 10 Q. Tim sorry. It may have been a poorly asked question. 11 Part of the reason it was surprising to you was because you didn't see her on a day-to-day basis working in the office? 19 A. Well, when I was She was not included in it. They wouldn't call and ask me what Marcia was going to get paid. 20 A. Correct. 21 Correct. 22 A. Correct. 23 A. Well, when you would have been surprised; correct? 24 A. Well, I told them she's not This is the first I've heard she's working. 25 A. Well, I told them she's not This is the first I've heard she's working. 26 A. Well, I told them she's not This is the first I've heard she's working. 27 A. Well, I told them she's not This is the first I've heard she's working. 28 A. Well, I told them she's not This is the first I've heard she's working. 29 A. Well, I told them she's not This is the first I've heard she's working. 20 In fact, it would have been surprising to you because you didn't really see her around the office; correct? 29 Q. I'm sorry. It may have been a poorly asked question. 20 Part of the reason it was surprising to you was because you didn't see her on a day-to-day basis working in the office? 20 A. Correct. 21 A. Correct. 22 A. Correct.	9 A. It was the first time she included Marcia in the	
12 A. It's been a couple years. I think it was probably 13 I don't recall the exact time, but 14 Q. Okay. Do you know today and if the answer is no, I 15 don't know, that's fine do you know today whether 16 or not Marcia was paid every year that you were there? 17 A. No, she was not paid every year that I was there. 18 Q. So you do know that she was not paid every year that 19 you were there? 10 A. No. 11 Ye heard she's working. 11 A. No. 12 In fact, it would have been surprising to you because you didn't really see her around the office; correct? 18 A. No. 19 Q. Well, why would it have been surprising? 19 A. No. 20 Q. I'm sorry. It may have been a poorly asked question. 21 Part of the reason it was surprising to you was because you didn't see her on a day-to-day basis 22 working in the office? 23 working in the office? 24 A. Correct.	6-1	
I don't recall the exact time, but 14 Q. Okay. Do you know today and if the answer is no, I 15 don't know, that's fine do you know today whether 16 or not Marcia was paid every year that you were there? 17 A. No, she was not paid every year that I was there. 18 Q. So you do know that she was not paid every year that 19 you were there? 10 A. No. 11 A. Well, I told them she's not This is the first I've 11 heard she's working. 12 No. 13 A. Well, I told them she's not This is the first I've 14 heard she's working. 15 Q. In fact, it would have been surprising to you because 16 you didn't really see her around the office; correct? 17 A. No. 18 Q. Well, why would it have been surprising? 19 A. No, it would not 20 Q. I'm sorry. It may have been a poorly asked question. 21 Part of the reason it was surprising to you was 22 because you didn't see her on a day-to-day basis 23 working in the office? 24 A. Correct.		1 126
14 Q. Okay. Do you know today — and if the answer is no, I don't know, that's fine — do you know today whether or not Marda was paid every year that you were there? 16 A. No, she was not paid every year that I was there. 17 A. No. 18 Q. So you do know that she was not paid every year that 19 you were there? 19 A. No, it would not — 20 A. That's correct. 21 Q. How do you know that? 22 Part of the reason it was surprising to you was 23 it was — She was not included in it. They wouldn't 24 Call and ask me what Mardia was going to get paid. 26 A. Correct. 27 Correct. 28 Q. I'm sorry. It may have been a poorly asked question. 29 Part of the reason it was surprising to you was 29 because you didn't see her on a day-to-day basis 20 working in the office? 21 Working in the office?		[· ·
don't know, that's fine do you know today whether or not Marcia was paid every year that you were there? A. No, she was not paid every year that I was there. 9. So you do know that she was not paid every year that you were there? 1.7 A. No. 1.8 Q. So you do know that she was not paid every year that you were there? 1.9 You were there? 1.0 A. That's correct. 1.0 Q. How do you know that? 1.1 A. No. 1.2 Q. Well, why would it have been surprising? 1.3 No, it would not 2.0 Q. I'm sorry. It may have been a poorly asked question. 2.1 Part of the reason it was surprising to you was because you didn't see her on a day-to-day basis working in the office? 1.0 A. Well, when I was She was not included in it. They wouldn't you working in the office? 1.9 A. No. 1.9 Well, why would it have been surprising to you because you didn't really see her around the office; correct? 1.0 A. No. 1.1 A. No. 1.2 Q. Well, why would it have been surprising? 1.3 In fact, it would have been surprising to you because you didn't really see her around the office; correct? 1.0 A. No. 1.1 Part of the reason it was surprising to you was because you didn't see her on a day-to-day basis working in the office? 1.1 A. No. 1.2 Q. Well, why would it have been surprising to you because you didn't really see her around the office; correct? 1.9 A. No. 1.9 Q. Well, why would it have been surprising? 1.9 A. No. 1.9 Q. Well, why would not 2.0 Q. I'm sorry. It may have been a poorly asked question. 2.1 Part of the reason it was surprising to you was because you didn't see her on a day-to-day basis working in the office? 1.0 A. No.		1 E
or not Marcia was paid every year that I was there. 1. A. No, she was not paid every year that I was there. 1. So you do know that she was not paid every year that 1. you were there? 1. A. No. 1. 9 Q. Well, why would it have been surprising? 1. 9 A. No, it would not 1. 10 Q. I'm sorry. It may have been a poorly asked question. 1. 11 Q. How do you know that? 1. 12 Part of the reason it was surprising to you was 1. 13 because you didn't see her on a day-to-day basis 1. 14 Correct. 1. 7 A. No. 1. 18 Q. Well, why would it have been surprising? 1. 9 A. No, it would not 2. 19 A. No, it would not 2. 10 Q. I'm sorry. It may have been a poorly asked question. 2. 11 Part of the reason it was surprising to you was 2. 22 because you didn't see her on a day-to-day basis 2. 23 working in the office? 2. 4. Correct.		{ · · · · · · · · · · · · · · · · · · ·
A. No, she was not paid every year that I was there. O. So you do know that she was not paid every year that you were there? A. That's correct. O. How do you know that? A. Well, why would it have been surprising? O. I'm sorry. It may have been a poorly asked question. Part of the reason it was surprising to you was because you didn't see her on a day-to-day basis working in the office? Call and ask me what Marcia was going to get paid. O. So you do know that I was not paid every year that I A. No. 18 Q. Well, why would it have been surprising? O. I'm sorry. It may have been a poorly asked question. Part of the reason it was surprising to you was because you didn't see her on a day-to-day basis working in the office? A. Correct.		l l
Q. So you do know that she was not paid every year that you were there? A. That's correct. Q. How do you know that? A. Well, when I was When I was handling the payroil, it was She was not included in it. They wouldn't Call and ask me what Marcia was going to get paid. Q. Well, why would it have been surprising? A. No, it would not 20 Q. I'm sorry. It may have been a poorly asked question. Part of the reason it was surprising to you was because you didn't see her on a day-to-day basis working in the office? A. Correct.		
you were there? A. That's correct. Q. How do you know that? A. Well, when I was When I was handling the payroll, it was She was not included in it. They wouldn't Call and ask me what Marcia was going to get paid. 19 A. No, it would not 20 Q. I'm sorry. It may have been a poorly asked question. 21 Part of the reason it was surprising to you was because you didn't see her on a day-to-day basis working in the office? 23 working in the office?		· 111
20 Q. I'm sorry. It may have been a poorly asked question. 21 Q. How do you know that? 22 A. Well, when I was When I was handling the payroll, 23 it was She was not included in it. They wouldn't 24 call and ask me what Marcia was going to get paid. 26 Q. I'm sorry. It may have been a poorly asked question. 27 Part of the reason it was surprising to you was because you didn't see her on a day-to-day basis working in the office? 28 Well, when I was not included in it. They wouldn't 29 Working in the office? 20 A. Correct.	- ·	
21 Q. How do you know that? 21 Part of the reason it was surprising to you was 22 A. Well, when I was When I was handling the payroil, 23 it was She was not included in it. They wouldn't 23 working in the office? 24 A. Correct.		
22 A. Well, when I was When I was handling the payroil, 22 because you didn't see her on a day-to-day basis it was She was not included in it. They wouldn't 23 working in the office? 4 call and ask me what Marcia was going to get paid. 24 A. Correct.	· ·	· · · · · · · · · · · · · · · · · · ·
it was She was not included in it. They wouldn't 23 working in the office? 4 call and ask me what Marcia was going to get paid. 24 A. Correct.		
4 call and ask me what Marcia was going to get paid. 24 A. Correct.	i i i i i i i i i i i i i i i i i i i	<u> </u>
		· •
5 Q. When did you start handling the payrolit 20 Q. Did you think there was anything wrong with that or	ı.	
	5 Q. When did you start handling the payroli?	23 Q. Did you trink there was anything wrong with that or

ļ	Page	89		Page
1	BY MR. CAMARGO:		1	the firm?
2	Q. Did you have any knowledge that Miss Krampitz was		2	A. No.
3	abusing prescription drugs?	Ì	3 `	MR. CAMARGO: Do you have anything else?
4	A. No.		4	MR. WARREN: I need to take a minute.
5	MR. CAMARGO: I have nothing else then from		5	MR, CAMARGO: Okay.
6	a question standpoint today.		- 6	MR, WARREN: No. Thank you.
. 7	EXAMINATION	.	7	EXAMINATION
	BY MR. WARREN:		8	BY MR. CAMARGO:
. 9	Q. Andrea, did you know that Ray became a shareholder of	_v e	9	Q. All right. Just a couple questions. You said you
10	the Selfman firm?		10	knew, there came a point where you knew that Marcia
12	,		11 ·	Seifman was being paid a salary?
12	A. Yes.	- 1	12	A. Yes.
	Q. Okay. Do you know when he became a shareholder?		L3	Q. And you just testified that you knew there came a
13	A. Here it goes to times.	1		
14	Q. If you don't remember, it's okay.	1		point where Ray Guzall was made a shareholder?
15	A. No, I don't.		1.5	A. Yes.
16	Q. During the entire time that Ray worked at your office,	- 1	4	Q. Did you know the intricacles of his becoming a
17	did he ever ask you to see the QuickBooks records?	}	.7 .	shareholder, how much of an interest he had in the
18	A. No.	1	.8	company or anything fike that?
19	Q. Did he ever ask you to print them out?	1		A. No.
20	A. No.	2		Q. Do you know whether he was an equal partner or just a
21 .	Q. Did he ever ask you to give him a copy or to look at	2.	1	partial partner or a member, or shareholder, I should
22.	Excel spreadsheets?	2:	2	say?
23 ,	A. No. Only where it applied to his specific client wh	en 2:	3 4	 I think he had percentage interest, but I don't kno
24	we're settling a case.	- 24	4	for sure. This was between him and Barry.
25 (Q. But did he ever express any interest to you about the	2:	5, (2. So you wouldn't know what percentage that interest
• :	Page 9	o		Page 9
1	financial dealings of the law firm?	. 1		would be?
2 A	financial dealings of the law firm? A. No.	1 2	A	would be?
2 A 3 Ç	financial dealings of the law firm? A. No. Q. You told us that there's a file, you kept a file I	. 1	Q	would be? No. When you discovered that Mrs. Seifman was receiving a
2 A	financial dealings of the law firm? A. No. Q. You told us that there's a file, you kept a file I think you said with credit card statements in a filing	1 2 3 4	Q	would be? No. When you discovered that Mrs. Selfman was receiving a salary, did you tell Ray Guzall about that?
2 A 3 C 4 5	financial dealings of the law firm? A. No. Q. You told us that there's a file, you kept a file I think you said with credit card statements in a filing cabinet?	1 2 3 4 5	Q	would be? No. When you discovered that Mrs. Seifman was receiving a salary, did you tell Ray Guzall about that? No.
2 A 3 C 4 5 A	financial dealings of the law firm? A. No. Q. You told us that there's a file, you kept a file I think you said with credit card statements in a filing cabinet? A. Yes.	1 2 3 4 5	A Q	would be? No. When you discovered that Mrs. Seifman was receiving a salary, did you tell Ray Guzall about that? No. Why not?
2 A 3 C 4 5 6 A 7 Q	financial dealings of the law firm? A. No. Q. You told us that there's a file, you kept a file I think you said with credit card statements in a filing cabinet? A. Yes. Q. Where's the credit — filing cabinet? Where's the	1 2 3 4 5 6	A Q A	would be? No. When you discovered that Mrs. Seifman was receiving a salary, did you tell Ray Guzall about that? No. Why not? Not my call. Why would I?
2 A 3 C 4 5 A 7 Q	financial dealings of the law firm? A. No. Q. You told us that there's a file, you kept a file I think you said with credit card statements in a filing cabinet? 4. Yes. Q. Where's the credit — filing cabinet? Where's the filing cabinet?	1 2 3 4 5 6 7	A Q	would be? No. When you discovered that Mrs. Seifman was receiving a salary, did you tell Ray Guzall about that? No. Why not? Not my call. Why would I? Well, I'm asking you, other than not your call, is
2 A 3 Q 4 5 6 A 7 Q 3 A	financial dealings of the law firm? A. No. Q. You told us that there's a file, you kept a file I think you said with credit card statements in a filing cabinet? A. Yes. Q. Where's the credit — filing cabinet? Where's the filing cabinet? A. It's in the office. It's in the room where the copier	1 2 3 4 5 6 7 8 9	A Q Q A	would be? No. When you discovered that Mrs. Seifman was receiving a salary, did you tell Ray Guzall about that? No. Why not? Not my call. Why would I? Well, I'm asking you, other than not your call, is that your answer?
2 A 3 C 4 5 6 A 7 Q 3 A	financial dealings of the law firm? A. No. Q. You told us that there's a file, you kept a file I think you said with credit card statements in a filing cabinet? A. Yes. Q. Where's the credit — filing cabinet? Where's the filing cabinet? A. It's in the office. It's in the room where the copier is.	1 2 3 4 5 6 7 8 9	A Q A. Q. A.	would be? No. When you discovered that Mrs. Seifman was receiving a salary, did you tell Ray Guzall about that? No. Why not? Not my call. Why would I? Well, I'm asking you, other than not your call, is that your answer? Well, it just wasn't about him.
2 A 3 C 4 5 5 A 7 Q 3 A	financial dealings of the law firm? A. No. Q. You told us that there's a file, you kept a file I think you said with credit card statements in a filing cabinet? A. Yes. Q. Where's the credit — filing cabinet? Where's the filing cabinet? A. It's in the office. It's in the room where the copier is. Q. All right. Was that credit card file in that filing	1 2 3 4 5 6 7 8 9 10	A Q Q A	would be? No. When you discovered that Mrs. Seifman was receiving a salary, did you tell Ray Guzall about that? No. Why not? Not my call. Why would I? Well, I'm asking you, other than not your call, is that your answer? Well, it just wasn't about him. Okay. Did you tell Ray Guzall about any of the
2 A 3 Q 4 5 6 A 7 Q 3 A	financial dealings of the law firm? A. No. Q. You told us that there's a file, you kept a file I think you said with credit card statements in a filing cabinet? A. Yes. Q. Where's the credit — filing cabinet? Where's the filing cabinet? A. It's in the office. It's in the room where the copier is. Q. All right. Was that credit card file in that filing cabinet when Mr. Guzail was still at the firm?	1 2 3 4 5 6 7 8 9 10 11 12	A Q A Q A Q Q A Q Q A	would be? No. When you discovered that Mrs. Seifman was receiving a salary, did you tell Ray Guzall about that? No. Why not? Not my call. Why would I? Well, I'm asking you, other than not your call, is that your answer? Well, it just wasn't about him. Okay. Did you tell Ray Guzall about any of the personal items such as cable or internet
2 A 3 Q 4 5 6 A 7 Q 3 A 0 Q	financial dealings of the law firm? A. No. Q. You told us that there's a file, you kept a file I think you said with credit card statements in a filing cabinet? A. Yes. Q. Where's the credit — filing cabinet? Where's the filing cabinet? A. It's in the office. It's in the room where the copier is. Q. All right. Was that credit card file in that filing cabinet when Mr. Guzali was still at the firm? Yes.	1 2 3 4 5 6 7 8 9 10 11 12 13	A Q A Q A Q A A Q A A A A	would be? No. When you discovered that Mrs. Seifman was receiving a salary, did you tell Ray Guzall about that? No. Why not? Not my call. Why would I? Well, I'm asking you, other than not your call, is that your answer? Well, it just wasn't about him. Okay. Did you tell Ray Guzall about any of the personal items such as cable or internet No.
2 A 3 C 5 A 7 Q 3 A . Q.	financial dealings of the law firm? A. No. Q. You told us that there's a file, you kept a file I think you said with credit card statements in a filing cabinet? A. Yes. Q. Where's the credit — filing cabinet? Where's the filing cabinet? A. It's in the office. It's in the room where the copier is. Q. All right. Was that credit card file in that filing cabinet when Mr. Guzail was still at the firm? Yes. Is that filing cabinet locked up?	1 2 3 4 5 6 7 8 9 10 11 12 13 14	A Q A Q A Q Q A Q Q A	would be? No. When you discovered that Mrs. Selfman was receiving a salary, did you tell Ray Guzall about that? No. Why not? Not my call. Why would I? Well, I'm asking you, other than not your call, is that your answer? Well, it just wasn't about him. Okay. Did you tell Ray Guzall about any of the personal items such as cable or internet No. that were being paid?
2 A 3 Q 5 A 6 A 7 Q 3 A. Q	financial dealings of the law firm? A. No. Q. You told us that there's a file, you kept a file I think you said with credit card statements in a filing cabinet? A. Yes. Q. Where's the credit — filing cabinet? Where's the filing cabinet? A. It's in the office. It's in the room where the copier is. Q. All right. Was that credit card file in that filing cabinet when Mr. Guzail was still at the firm? Yes. Is that filing cabinet locked up? No.	1 2 3 4 5 6 7 8 9 10 11 12 13 14	A Q A Q A Q A A Q A A A A	would be? No. When you discovered that Mrs. Selfman was receiving a salary, did you tell Ray Guzall about that? No. Why not? Not my call. Why would I? Well, I'm asking you, other than not your call, is that your answer? Well, it just wasn't about him. Okay. Did you tell Ray Guzall about any of the personal items such as cable or internet No. that were being paid?
2 A 3 C 4 5 6 A 7 Q 3 A. Q. A.	financial dealings of the law firm? A. No. Q. You told us that there's a file, you kept a file I think you said with credit card statements in a filing cabinet? A. Yes. Q. Where's the credit — filing cabinet? Where's the filing cabinet? A. It's in the office. It's in the room where the copier is. Q. All right. Was that credit card file in that filing cabinet when Mr. Guzail was still at the firm? Yes. J. Is that filing cabinet locked up? No. Do you know where Mr. Seifman keeps the check	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A Q A Q A Q A Q . A Q .	would be? No. When you discovered that Mrs. Selfman was receiving a salary, did you tell Ray Guzall about that? No. Why not? Not my call. Why would I? Well, I'm asking you, other than not your call, is that your answer? Well, it just wasn't about him. Okay. Did you tell Ray Guzall about any of the personal items such as cable or internet No. that were being paid?
2 A A A A A Q A A Q Q A	financial dealings of the law firm? A. No. Q. You told us that there's a file, you kept a file I think you said with credit card statements in a filing cabinet? A. Yes. Q. Where's the credit — filing cabinet? Where's the filing cabinet? A. It's in the office. It's in the room where the copier is. Q. All right. Was that credit card file in that filing cabinet when Mr. Guzail was still at the firm? Yes. J. Is that filing cabinet locked up? No. Do you know where Mr. Seifman keeps the check registers for the accounts?	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A Q A Q A Q A Q A Q A Q A A Q A A Q A A Q A A Q A A Q A A Q A A A Q A	would be? No. When you discovered that Mrs. Seifman was receiving a salary, did you tell Ray Guzall about that? No. Why not? Not my call. Why would I? Well, I'm asking you, other than not your call, is that your answer? Well, it just wasn't about him. Okay. Did you tell Ray Guzall about any of the personal items such as cable or internet No. that were being paid? MR. WARREN: You have to let him finish the question. I'm sorry. No.
2 A C C A A A A C C A A . C A A . C	financial dealings of the law firm? A. No. Q. You told us that there's a file, you kept a file I think you said with credit card statements in a filing cabinet? A. Yes. Q. Where's the credit — filing cabinet? Where's the filing cabinet? A. It's in the office. It's in the room where the copier is. Q. All right. Was that credit card file in that filing cabinet when Mr. Guzail was still at the firm? Yes. Is that filing cabinet locked up? No. Do you know where Mr. Seifman keeps the check registers for the accounts? Yes.	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A Q A Q A Q A Q A Q A A Q A A Q A BY	would be? No. When you discovered that Mrs. Seifman was receiving a salary, did you tell Ray Guzall about that? No. Why not? Not my call. Why would I? Well, I'm asking you, other than not your call, is that your answer? Well, it just wasn't about him. Okay. Did you tell Ray Guzall about any of the personal items such as cable or internet No. that were being paid? MR. WARREN: You have to let him finish the question. I'm sorry. No. MR. CAMARGO:
2 A A A A A Q A A Q Q A	financial dealings of the law firm? A. No. Q. You told us that there's a file, you kept a file I think you said with credit card statements in a filing cabinet? A. Yes. Q. Where's the credit — filing cabinet? Where's the filing cabinet? A. It's in the office. It's in the room where the copier is. Q. All right. Was that credit card file in that filing cabinet when Mr. Guzail was still at the firm? Yes. Lis that filing cabinet locked up? No. Do you know where Mr. Seifman keeps the check registers for the accounts? Yes. Where does he keep them?	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A Q A Q A Q A Q A Q A Q A A Q A A Q A A Q A A Q A A Q A A Q A A A Q A	would be? No. When you discovered that Mrs. Seifman was receiving a salary, did you tell Ray Guzall about that? No. Why not? Not my call. Why would I? Well, I'm asking you, other than not your call, is that your answer? Well, it just wasn't about him. Okay. Did you tell Ray Guzall about any of the personal items such as cable or internet No. that were being paid? MR. WARREN: You have to let him finish the question. I'm sorry. No. MR. CAMARGO: Did you ever pay with corporate checks for Mr.
2 A C C A A A A C C A A . C A A . C	financial dealings of the law firm? A. No. Q. You told us that there's a file, you kept a file I think you said with credit card statements in a filing cabinet? A. Yes. Q. Where's the credit — filing cabinet? Where's the filing cabinet? A. It's in the office. It's in the room where the copier is. Q. All right. Was that credit card file in that filing cabinet when Mr. Guzail was still at the firm? Yes. J. Is that filing cabinet locked up? No. Do you know where Mr. Seifman keeps the check registers for the accounts? Yes. Where does he keep them?	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A Q A Q A Q A Q A Q A A Q A A Q A BY	would be? No. When you discovered that Mrs. Seifman was receiving a salary, did you tell Ray Guzall about that? No. Why not? Not my call. Why would I? Well, I'm asking you, other than not your call, is that your answer? Well, it just wasn't about him. Okay. Did you tell Ray Guzall about any of the personal items such as cable or internet No. that were being paid? MR. WARREN: You have to let him finish the question. I'm sorry. No. MR. CAMARGO:
2 A 4 5 5 A A 5 7 Q A A . Q . A . Q .	financial dealings of the law firm? A. No. Q. You told us that there's a file, you kept a file I think you said with credit card statements in a filing cabinet? A. Yes. Q. Where's the credit — filing cabinet? Where's the filing cabinet? A. It's in the office. It's in the room where the copier is. Q. All right. Was that credit card file in that filing cabinet when Mr. Guzail was still at the firm? Yes. J. Is that filing cabinet locked up? No. Do you know where Mr. Seifman keeps the check registers for the accounts? Yes. Where does he keep them? At his desk.	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A Q A Q A Q Q A A Q Q A A Q Q A A Q Q A A Q Q A A Q Q A A Q Q A A Q Q A A Q Q A A Q Q A A Q Q A A A Q Q A A A A Q Q A A A A Q Q A A A A Q Q A A A A Q Q A A A A Q Q A	would be? No. When you discovered that Mrs. Seifman was receiving a salary, did you tell Ray Guzall about that? No. Why not? Not my call. Why would I? Well, I'm asking you, other than not your call, is that your answer? Well, it just wasn't about him. Okay. Did you tell Ray Guzall about any of the personal items such as cable or internet No. that were being paid? MR. WARREN: You have to let him finish the question. I'm sorry. No. MR. CAMARGO: Did you ever pay with corporate checks for Mr. Guzail's internet or cable? No.
2 A 4 5 A 6 A 9 Q A Q A Q A A Q A A Q A A C A C A A C A	financial dealings of the law firm? A. No. Q. You told us that there's a file, you kept a file I think you said with credit card statements in a filing cabinet? A. Yes. Q. Where's the credit — filing cabinet? Where's the filing cabinet? A. It's in the office. It's in the room where the copier is. Q. All right. Was that credit card file in that filing cabinet when Mr. Guzail was still at the firm? Yes. J. Is that filling cabinet locked up? No. Do you know where Mr. Seifman keeps the check registers for the accounts? Yes. Where does he keep them? At his desk. Do you know if they're locked up?	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A Q A Q A Q Q A A Q Q A A Q Q A A Q Q A A Q Q A A Q Q A A Q Q A A Q Q A A Q Q A A Q Q A A Q Q A A A Q Q A A A A Q Q A A A A Q Q A A A A Q Q A A A A Q Q A A A A Q Q A	would be? No. When you discovered that Mrs. Seifman was receiving a salary, did you tell Ray Guzall about that? No. Why not? Not my call. Why would I? Well, I'm asking you, other than not your call, is that your answer? Well, it just wasn't about him. Okay. Did you tell Ray Guzall about any of the personal items such as cable or internet No. that were being paid? MR. WARREN: You have to let him finish the question. I'm sorry. No. MR. CAMARGO: Did you ever pay with corporate checks for Mr. Guzall's internet or cable?
2 A 4 5 A 6 A 9 Q A A Q A Q Q Q A Q Q Q A Q Q Q A Q Q Q A Q Q Q A Q Q Q A Q Q Q A Q Q Q A Q Q Q A Q Q Q A Q Q Q A Q Q Q Q A Q Q Q Q A Q Q Q Q A Q	financial dealings of the law firm? A. No. Q. You told us that there's a file, you kept a file I think you said with credit card statements in a filing cabinet? A. Yes. Q. Where's the credit — filing cabinet? Where's the filing cabinet? A. It's in the office. It's in the room where the copier is. Q. All right. Was that credit card file in that filing cabinet when Mr. Guzail was still at the firm? Yes. Is that filing cabinet locked up? No. Do you know where Mr. Seifman keeps the check registers for the accounts? Yes. Where does he keep them? At his desk. Do you know if they're locked up? No, they're not.	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	AAQAAAQAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAA	would be? No. When you discovered that Mrs. Seifman was receiving a salary, did you tell Ray Guzall about that? No. Why not? Not my call. Why would I? Well, I'm asking you, other than not your call, is that your answer? Well, it just wasn't about him. Okay. Did you tell Ray Guzall about any of the personal items such as cable or internet No. that were being paid? MR. WARREN: You have to let him finish the question. I'm sorry. No. MR. CAMARGO: Did you ever pay with corporate checks for Mr. Guzall's internet or cable? No.
2 A C A A A A A A A A A A A A A A A A A	financial dealings of the law firm? A. No. Q. You told us that there's a file, you kept a file I think you said with credit card statements in a filing cabinet? A. Yes. Q. Where's the credit — filing cabinet? Where's the filing cabinet? A. It's in the office. It's in the room where the copier is. Q. All right. Was that credit card file in that filing cabinet when Mr. Guzail was still at the firm? Yes. J. Is that filing cabinet locked up? No. Do you know where Mr. Seifman keeps the check registers for the accounts? Yes. Where does he keep them? At his desk. Do you know if they're locked up? No, they're not.	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	AAQAAQQAAAQQAAAQQAAAQQAAAQQAAAQQAAAQQAAAQQAAAQQAAAQQAAAQQAAAQQAAQQAAAQQAQQAQQAQQAQQAQQAQQAQQAQQAQQAQQAAQQQAQQAQQAQQQAQQQAQQQQ	would be? No. When you discovered that Mrs. Seifman was receiving a salary, did you teil Ray Guzall about that? No. Why not? Not my call. Why would I? Well, I'm asking you, other than not your call, is that your answer? Well, it just wasn't about him. Okay. Did you tell Ray Guzall about any of the personal items such as cable or internet No. that were being paid? MR. WARREN: You have to let him finish the question. I'm sorry. No. MR. CAMARGO: Did you ever pay with corporate checks for Mr. Guzall's internet or cable? No. Did you ever pay for his phone bill?

Page 9.	3	Page 9
never paid anything. The testimony is that the checks	1	CERTIFICATE OF NOTARY
2 were written by Mr. Seifman, so perhaps you'd like to	2	STATE OF MICHIGAN)
3 correct your question.	3 -) SS
· 4 MR. CAMARGO: Sure.	4 *	COUNTY OF WAYNE)
5 BY MR. CAMARGO:	5	
6 Q. Did you ever receive any checks from Mr. Seifman or	6	I, JOANNE SMITH, certify that this
7 see any corporate checks that were used to pay for Mr.	7	deposition was taken before me on the date
8 Guzall's internet or cable?	8	hereinbefore set forth; that the foregoing questions
9 A. No.	9	and answers were recorded by me stenographically and
10 Q. Did you ever see, have knowledge of or review any	10	reduced to computer transcription; that this is a
corporate checks that were used to pay for his phone	11	true, full and correct transcript of my stenographic
12 bill?	12	
13 A. No.	13	notes so taken; and that I am not related to, nor of
14 Q. How about dental bills?	1	counsel to, either party nor interested in the event
15 A. No.	14	of this cause.
	15	
the state of the s	16	
	17	
18 Q. Did you ever see car payments for Mr. Guzali?	18	
	19	
Q. At a certain point there come a time when some car	20	
payments were being made for Mr. Guzall; correct?	21	Joanne Sta
22 A. Yes.	22	JOANNE SMITH, CSR-3099,
23 Q. How about for Mr. Seifman?	23	Notary Public,
4 A. At any point in time?	24	Wayne County, Michigan
5 Q. There were times when there was; is that correct?	25	My Commission expires: 1-24-17
A. Yes. Q. And there were times when there weren't car payments? A. Yes. Q. Did you see any gym memberships paid for Mr. Guzall? A. No. Q. Did you see any of these items we've gone through paid for Mr. Guzall? A. No. MR. CAMARGO: I don't have anything else. EXAMINATION BY MR. WARREN: Q. Before Mr. — I'm sorry. When you started maintaining — You know what, never mind. Thank you very much. A. Okay. MR. CAMARGO: Thank you. MR. GUZALL: Thank you, Andrea. (The deposition was concluded at 3:04 p.m. Signature of the witness was not requested by counsel for the respective parties hereto.)		Haristinanninaninaninaninaninaninaninaninanin
		E CHESTER STATES
		\$12

EXHIBIT 14

5133180 ROOT CANAL SPECIALIST 31670 SCHOOLCRAFT LIVONIA, MI 48158 734-261-7800

Page I of I

IERMIHAL IO.

MASTERCARD

INU: 000018 JINE1:11:47 DATE! Nor 19, 19

AUTH:09095Z

TOTAL

\$88.00

Root Canal Specialty Assoc

31620 Schoolcraft Rd. Livonia, MI 48150-8150 (734) 261-7800

nt #: L058324).

Account Balance: \$28.00 Home: (248) 661-Patient: \$0.00 Estimated CUSTOMER COPY Business: (248) 217insurance: \$28.00 Next Recall: None Scheduled ? Guarantor: Marcia Seifman Next Appt: None

					·	Poetalle	ļ			Est	imated
	Code		Services			th/Quac	Sumace	s Charges	Credits	la Patien	nsulance
O3/29/2010 ·	D0140	LIMITED ORAL	EVALUATION	E		• ,		. \$88.00	\$88.00	\$0.00	: \$0.00
03/29/2010	D0220	PERIAPICAL S	INGLE FILM		<u>. </u>	14	<u> -</u>	\$28.00	\$0.00	\$0.00	\$28.00
* 3				•	•			\$116.00	\$88.00	\$0.00	\$28.00

THE STATE OF THE S			Summany :	
Ī	Previous Balance		by: Master Card ::	
÷	. Charges		上文《ADDA TES Notes Processes Sales S	
-	Payments	\$88.00	Your insurance carrier has paid less than we anticipated due to what they consider	Merchant #: Date:
-	Adjustments	! ค.ค.ค.ค.	lieual Customary therefore the halance	Term. #:: Time:
=	Current Balance	\$28.00	remaining is your resposibility.	Card #: Trans. #:
 	Personal Balance	\$0.00		Auth, #:
			,	Name:

SEIFMAN & GUZALL, P.C.

30565 NORTHWESTERN HWY., SUITE 255 FARMINGTON HILLS, MI 48334

Doc 11642-3 Filed 10/26/16

Entered 10/26/16 15:41:45 Page 12 of

DATE	OESCRIPTION		PATIENTSWAME		CREDITS
11/07/2007	Balance Forward	•		77.20	
* 11/08/2007	Crown-full cast high noble mtl		MARCIA MARCIA	849.00	-412.00
12/13/2007	Dental ins Pmt-(11/29/2007)-GUARDI.	1	MARCIA		-77.20
11/12/2007	Payment by Mail-Thank You Ch.# 779	8 .	MARCIA	0.00 .	77,20
11/29/2001	,				
				, , , , , , , , , , , , , , , , , , ,	
			إسر		
.	e de la companya del companya de la companya del companya de la co		1.1	1,014	· ·
				$a(\cdot)$	
					. /n X I
	•	•		AMUI	が/·/·
					4: 1
	• •				
,					
			-		
Indicates that Den	tal insurance has been billed.			-	
Regular monthly	payments are necessary to keep your a	account cun ent.			
PRIOREAL	NOE CURRENT CREDITS	SERRENT	CAARGES	NEWEALANCE	
77.20	489.20	849	e.00 =	437.00	
<u>, , , , , , , , , , , , , , , , , , , </u>	LEASE PAY BY JANUARY 21, 2008. THAN	JK YOU.			
APPY NEW TEAR! T	CENTEL MEDI AUROPORTE EL ENGRE 1140		PLE	ASE PAY	427.00
			THIS	AMOUNT	437.00
·		•			· ·
ENTRIX 1987-2005	DLSTM 2	 		Mack Family Dentistry - 2	7855 Plymouth Rd /
:				Livonia, MI 481	50 (734)261-5100 /

	oww.aa.com	Amount 10.00 30.00	Amount 0.00 Amount 0.00	0.0	
How To Reach US. 1988-766-CITI(2484) Customer Service Blox 6500 Sloux FALLS, 50	N.This Statement			00.0%	Scissor Eagle Design
Hew To Re 1-889-766. Customer Box 6500 Slouy FAL	S Updala Section	248-9874800 MI BIRMINGHAM W	S FOR THIS PERIOD EREST FOR THIS PERIOD ZOII Totals Your	ear-to-bate	sor Eagle Design and
	ee The American Arithmetical Miles Update Section Vinents, Credits and Adjustments lee The Post Description 06/29 PAYMENT THANK YOU	Description PLANET FITNESS CLAVENNA VISION Description	TOTAL FEES FOR THIS PERIOD Description TOTAL INTEREST FOR THIS PERIOD ZOII Totals You	Total Inferest charged in 2011 Total Inferest charged in 2011 Advantede, Aartennest Advanted in 2011	nes, Inc.
	See The American Aldustment Sale Post Description 06/29 BAYMENT TH Standard Phress	事 く シェンコン	Charged. Post: Desc	Total Interes ch Total Interes	i saulik ien sig
Www.cit.l Account BARRY Member	a w		Interest c	00 America	
Account Nu		die St.	of the property of the property any	₹	
Summary of Accountry Previous Balance	Other Credits Purchases Cash Advances Fees Clarined Interest Charged New Belance Past Due Amount Ant, Ovér Rey, Or	revolving Credit Ling Avail. Revolving Credit Cash Advance Linit Available Cash Limit Statement Closing De Days in Billing Cycle	III III SESSI	15. at 1-866-765	
Acciunt Activity Jun 16-Jul 15, 2011		在1940年	FINE TO THE STATE OF THE STATE	ors online at t or by calling u	
/A'Adr	1.37.2.011. Payment must he received by 5:00 pm. Payment Warning: If we do not receive your to pay a late fee of up to 5:35 and your APRS flag related up to the variable Penalty APR of 29.99% of the boat of the courseling services, call f-817-337-8187.		e check pa	ay other credit	The second secon
Citi® Platinum Selecte	Late Payment Payment must be received by 5000 pM. Late Payment Warming: If we do not receive your minimum payment Warming: If we do not receive your have to pay a falle fee of up to \$35 and your APRS may be increased up to the variable Penalty APR of 29.99%. For information about credit sourseling services, call Fatt-337-8181.		You can use the check payable to yourself to use the mone	You can also pay other creditors online at balancetransfer citicards com or by calling us at 1-866-765 exon citions (south palots), 114 citi and citi willn Arc Designature pristend service marks of citigory, inc.	
13-53846-tit Do		d 10/26/16 44		/26/16·15:41:45	5 Page 14 of

Amount 10.00 Amount. -243.37 How To Reach Us 1-888-766-CITI(2484) Customer Service BOX 6500 Sloux FALLS, SD 57117 CVS PHARMACY #8044 QO3 FARMINGTON HI MI CAFE RENDEZVOUS · OPS FARMINGTON HIMI CANCER CENTER PHARMACY ANN ARBOR 248-9874800 MI Description
PAYMENT THANK YOU American Airlines A'Advantage° Miles Payments, Credits and Adjustments Description Standard Purchases 04/01 Member Since 2001 03/2B Post 03/27 03/23 www.citicards.com 41/50 EARRY A SEIFMAN Aecount Member 04/01 03/28 03/23 Sale. Sale 14966 Account Number unmary of Account Activity Marning: If we do not receive your int by the date listed above, you may te fee of up to \$35 and your APRs may to the variable Penalty APR of 29.99%. For information about credit counseling services, calif-877-337-8157. Citi° Piatinum Select°/A'Advantage® Account Mar 16-Apr 15, 20th Account Activity **35.04.75.6** New Balance; Late Payment Warning: If we do not minimum payment by the date listed at Minimum Payment Due: Payment Due Date:

which provide you extra value and security: Your card comes with built-in benefits

30.00 47.53

CVS PHARMACY #B044 Q03 FARMINGTON HI MI

OUTPATIENT PHARMACY #1 ANN ARBOR

04/02

04/03

Fees Sale

• Citi Identity Theft Solutions: If you suspect identity theft, Citi is there to help you reclaim You'r identity and reestabilish your credit - even if it's not your Citi account that was affected.

- \$0 Llability for Unauthorized Charges: With Citi's \$0 liability policy you won't pay for Car Rental Insurance, You're automatically covered when you reserve and rent
a covered vehicle with your Citi Card, so you can says money by declining the car rental company's collision, loss/damage walver.

OZDIO Cilibank (South Dakola), ILA. Cill and Cill wilh Acc Dashin are segistered sarvice masis of Ciligroup inc

Page 15

1GENDO9110

\$0.00 \$0.00 AmericanAirlines, AAdvantage, AAdvantage with Scissor Eagle Design and Scissor Eagle Design 2011 Totals Year-to-Date Total Interest charged in 2011 Total fees charged in 2011

Amount 000

Description TOTAL INTEREST FOR THIS PERIOD

Post

Interest Charged

Description TOTAL FEES FOR THIS PERIOD

Post

000

Amount

11642-3 10/26/<u>16</u> 44 10/26/16 -53846-tjt Doc Filed 5:41:45



#0000480

BRIGHT HOUSE NETWORKS 14525 FARMINGTON RD LIVONIA MICH 48154-5405 8281 9800 BH RP 11 03122009 YANNINY

MARCIA SEIFMAN 30069 HIGH VALLEY RD FARMINGTON HILLS MI 48331-2144

ելլլալիլիկութերերերի ակոլիկութերութ

Please see reverse side for account details.

Statement of Account

Statement Date: Account Number: Page 1 of 3 March 11, 2009

17757

How To Reach Us... 248/553-7300 M-TH8:30-7 FRI 8:30-6 SAT 9-2、24HR SERVICE 248/553-7307

24HR INTERNET SERVICE 1-866-233-7233

ck 8510 29

Account Summary

.

Previous Statement Balance \$149.9 Payment(s) -149.9 Current Monthly Service(s) 144.65 Other Charge(s), Taxes & Fee(s) 6.67

PAYMENTS RECEIVED after 03/11/09 are not included on this statement

Balance Due

Payment Due Date

\$151.32 03/31/09

For Your Information

BRIGHT HOUSE NETWORKS MAKES THE DIGITAL TV TRANSITION EASY: As long as you're a Bright House Networks customer and all of your household TV's are plugged in our cable lines; you are ready for the transition to digital TV in June 2009. So sit back, relax, and enjoy your favorite programming brought to you by Bright House Networks!



On Time Performance is hard to find. At Bright House Networks It is guaranteed! If we fall to arrive for a scheduled appointment on time, you will receive a \$20.00 credit.

8-53846-tjt Doc 11642-3 Filed 10/26/16 Entered 10/26/16 15:41:45 Page 16



MARCIA SEIFMAN Statement Dale: Account Number:

Page 2 of 3 March'11, 2009 -_117757

Account	Detail	This statement is for services from 03/22/09 through 04/2	1/09.
Previous Stateme	ent Balance		\$ 149.94
Payment(s) 03/02 Current Monthl		ank You	149.94 149.94
03/22 - 04/21 03/22 - 04/21	Digital HBO Dig Add'l Eqpt/ Your Servic Digital Equipme Cable Card Cable Card Digital Add'l Tiel Digital Add'l Tiel Digital Combo Your Packag And High Sp	age Includes: High Definition Tier And Digital Video Recor serv ses Include: Tier, Interactive Guide, Digital Equipment \$6.9 ent r	12.00 9.00 9.00 5 6.95 2.95 2.95 00 00 96.90
iher Charge(s),	Taxes & Fee(s)		
3/11 8/11 8/11	PEG FeeSubtotal		1.03 6.67
alance Due	************	**************************	\$ 151 32

Your Franchising Authority is Sweec 23300 Nine Mile Road, Farmington, Mil 48336 248/473-2800. The Sweec Office is Not Responsible For Billing OR Service Questions, Please Direct All Inquiries To Bright House Networks At The Phone Numbers On The Statement.



Monthly Statement Apr 29 - May 28, 2011

GIII A SYGIATION	
Previous Bill	71.93
Payment Received 5-11-Thank	AYout 71,93CR
Adjustments	الله المنظمة ا المنظمة المنظمة
Balanca.	.00
Current Charges	\$4.70.5.6 st. 96.5 \$74.97
Total Amount Due	\$71.97
Amount Due in Full by	Jun 18, 2011

Billing Questions? Visit att.com/billing

Plans and Services 1-800-288-2020		, 65.88
Other AT&T Long Distance 1-800-288-2020		_ 6.09
Testal of Current Charges		71.97

BARRY A SEIFMAN. 30069 HIGH VALLEY RD FARMINGTN HLS, MI 48331-2144

Page 1ot3 Account Number 248 661 Silling Date May 28, 2011

Web Site att.com

•Thank you for being an AT&T customer, featuring savings from:
• AT&T Michigan
• AT&T Long Distance • AT&T Michigan

	A PROPERTY OF THE		
Monthly Service - May 28 thru Jun 2	7	7	
Combined Communications Svcs			52.00
ALL DISTANCE®			
by AT&T Michigan			
Call Plan Unlimited	- 1		
Caller Identification	1		$^{\prime}$
Calling Name Display	1	1	12/
Three-Way Calling	7 11 6	Alla	<i>'</i>
Automatic Callback	√۰۷ر	, ()U i	111
Call Forwarding	- 1	. V 1, 1	1:1
Selective Call Screening	· L	· 11/1	ויע
Call Waiting		(10)	
Privacy Manager		47	
Speed Calling		, V	
Call Waiting ID		•	
LINE-BACKER® ·			
United Nationwed Clg Advantage	1		
by AT&T Long Distance			
Federal Access Charge		•	5.34
Total Monthly Service			57.34
total promising outside			
Surcharges and Other Fees			
9-1-1 Emergency System			
Billing for more than one city/counties			.29
Emergency 9-1-1 Operational Assessmen	a t		
Billing for more than one city/counties			. ,23
Michigan State E911		."	.19
Federal Universal Service Fee			2.43 .
Carrier Cost Recovery Fee (Long Dist)			1.99
Total Surcharges and Other Fees			5.13
Taxes	· · · · · · · · · · · · · · · · · · ·		

- PREVENT DISCONNECT
- PAYMENT OPTIONS
 ELECTRONIC PAYMENTS

- WIN A DREAM VACATION
- CARRIER INFO
- MI STATE ACCESS FUND
- SERVICE INFORMATION
- CUSTOMER SUPPORT
- CALL BEFORE YOU DIG!
- PHONEWITH USABILITY See "News You Can Use" for additional information.

Taxes State at 6%

Total Plans and Services

3,41 65.88



BARRY A SEIFMAN 30069 HIGH VALLEY RD FARMINGTN HLS, MI 48331-2144

Page 2 of 3 Account Number 248 661-Billing Date May 28, 2011

A CHARLES OF THE PARTY OF THE P

Thank you for subscribing to ALL DISTANCE® service with unlimited domestic long distance provided by AT&T Long Distance (\$19.00 of the total ALL DISTANCE® service package price is United Nationwed Cig Advantage 1, the domestic direct dial long distance service, not including taxes and surcharges). ALL DISTANCE® service call detail and any other AT&T Long Distance charges will be listed below. Any usage not previously billed may appear within the details below.

Message Regarding Terms & Conditions: To view your Terms & Conditions for AT&T Long Distance, access www.att.com/servicepublications or call 1-888-225-8530 to have a copy mailed. Invoice Summary 13, 2011) (25 of May Current Charges 5,00 Service Charges Credits and Adjustments ,00 .00 Call Charges Surcharges and Other Fees .75 .34 Total Invoice Summary 6.09 Service Charges Monthly Service Charges Type of Service Period i Unlimited Call Ad 1 05/11-06/10 .00 2. Worldwide Value Call 05/11-06/10 5.00 Total Honthly Service Charges 5.00 5.60 Total Service Charges Call Charges - Apr 11th thru Hay 10th Domestic Usaga Summary Calls for 248-661-2752 160 Domestic Minutes Used Number of Calls Total Domestic Direct Dial Charges .00 To obtain a copy of previous call detail for up to 24 months at no charge, contact AT&T Long Distance customer service at the number listed in the - Billing-Summary section on page 1.... Surcharges and Other Fees

Total Other AT&T Long Distance

6.04

PREVENT DISCONNECT

Thank you for being a valued customer. It is important to inform you that all charges must be paid each month to keep your account current and prevent collection activities. In addition, please be aware that we are required to inform you of certain charges that MUST be paid in order to prevent interruption of basic local service. These charges are already included in the Total Amount Due and are \$20,00.

AT&T Long Distance, or a company that resells their service, is your long distance and local toll carrier.

PAYMENT OPTIONS

Visit att.com to pay your AT&T bills online FREE of charge. Additional payment options can also be viewed online. Self-service is available anytime day or night by calling 1.800.288.2020 - just say "Pay My Bill*. Payments made with an AT&T representative may be subject to a \$5.00 payment convenience fee.

MI STATE ACCESS FUND-

Effective 7/1/2011, AT&T will begin to assess the Michigan (MI) State Access fund surcharge on intrastate charges to recover AT&T's required contribution to this fund. The charge will appear as MI State Access Fund under the Surcharges and Other Fees section of your bill. For more information please contact us at 1,800,288,2020.

ELECTRONIC PAYMENTS

When making a secure electronic bill payment from your bank account over the phone, you will need to provide sufficient information to authenticate yourself as the account owner. By providing thisinformation, you are authorizing ATET and your financial institution to process a one-time debit from your bank account for payment of your bill. Other bill payment options are available at www.att.com.

SERVICE INFORMATION

Your local services are provided by AT&T Michigan (Michigan Bell Telephone Company). Your AT&T long distance services, if any, are provided by one or more of the following AT&T inc. subsidiaries: AT&T Long Distance (SBC Long Distance, LLC), AT&T Communications of Michigan, Inc., and/or AT&T Corp. You can find the name of your long distance service provider in the long distance section of your bill. To view your provider's service publications, including Guidebooks. Service Guides and/or Tariffs, go to att.com/servicepublications.

WIN A DREAM VACATION:

Save time with AT&T Paperless Billing and get 100 bonus entries for your change to win a \$15,000 vacation or cash! No purchase necessary. Contest ends 6/30/2011. Visit att.com/wintrip for official contest

[Qtal invoice Charges

Taxes

4. Federal

6. Municipal

.7, Mon Homa State

5. Stata

Total Taxes

. 3. Fed Universal Service Fund

Total Surcharges and Other Fees

6.09

.75

.75

.00

.34

.00

.00

.34

Filed 10/26/16 Entered 10/26/16 15:41:45 13-53846-tit Doc 11642-3

BILLING DATE: 06/09/2000 ACCOUNT NUMBER: 0017473 RENEWAL FOR:

MARCIA SEIFMAN 30069 HIGH VALLEY RD FARMINGTON; MI 48331-2144 AMOUNT PAID: 7140, CHECK NUMBER:

Your subscription is up for renewal. As you can see we have many price discounts available.

Please take a moment to renew your subscription today. The Detroit Jewish News thanks you for your loyalty and we look forward to continuing to serve you 52 weeks a year.

pd ch

KEEP THIS PORTION FOR YOUR RECORDS

JEWISH RENAISSANCE MEDIA

If payment is not received within 31 days of due date, coverage will lapse.

P.O. Box 6160 Carol Stream, IL 60197-6160 I-800-621-8981 www.abendowment.org

CERTIFICATE HOLDER ID:

. 00928516

BARRY A. SEIFMAN 30069 HIGH VALLEY FARMINGTON HILLS MI 48331

BUS. PH. NO: (248)538-0711 DUE DATE: August 01, 2008

BARRY A. SEIFMAN

IMPORTANT MESSAGE

DEAR INSURED MEMBER: THANK YOU FOR YOUR SUPPORT AND PARTICIPATION IN THE ABE INSURANCE PLAN(S) DESCRIBED BELOW. IT IS ONLY BECAUSE OF MEMBERS SUCH AS YOU THAT THE ENDOWMENT IS ABLE TO PROVIDE FUNDING FOR HUNDREDS OF RESEARCH AND EDUCATIONAL PROJECTS IN THE FIELD OF LAW. IN ORDER TO MAINTAIN THIS IMPORTANT INSURANCE COVERAGE, PLEASE PAY THIS BILL BY THE DUE DATE. RENEE Z. LESKIW, EXECUTIVE DIRECTOR

•	•	•			
	Program	Coverage	Mode*	Premium Payment Period	Premium
DISABILITY	MEMBÉR	\$5, -0 00.	Q	08/01/2008 - 10/31/2008	\$316.11

A=Annual S=Semiannual Q=Quarterly

\$316.11

Credit/

Debit \$0.00

\$316.11

00928516

OUESTIONS? CALL YOUR PERSONAL ENDOWMENT REPRESENTATIVE

Please see reverse side for important dividend information.

remium Due Notice

If payment is not received within 31 days of due date, coverage will lapse.





P.O. Box 6160 Carol Stream, IL 60197-6160 1-800-621-8981 www.abendowment.org

CERTIFICATE HOLDER ID:

BARRY A. SEIFMAN 30069 HIGH VALLEY FARMINGTON HILLS MI 48331

BILL NO: 9996677747

BUS. PH. NO: (248) 538-0711 DUE DATE: August 01, 2011

INSURED: BARRY A., SEIFMAN

IMPORTANT MESSAGE

DEAR INSURED MEMBER: . THANK YOU FOR YOUR SUPPORT AND PARTICIPATION IN THE ABE INSURANCE PLAN(S) DESCRIBED BELOW. IT IS ONLY BECAUSE OF MEMBERS SUCH AS YOU THAT THE ENDOWMENT IS ABLE TO PROVIDE FUNDING FOR HUNDREDS OF RESEARCH AND EDUCATIONAL PROJECTS IN THE FIELD OF LAW. IN ORDER TO MAINTAIN THIS IMPORTANT INSURANCE COVERAGE, PLEASE PAY THIS BILL BY THE DUE DATE.

RENEE Z. LESKIW, EXECUTIVE DIRECTOR

	Program		Coverage	Mode*	Premium Payment Period	Premium
: DISABILITY	MEMBER	90 DAY	\$5,000 /MO	<u>O</u> .	08/01/2011 -10/31/2011 ·	\$316.11

n = 100 77

*A=Annual S=Semiannual Q=Quarterly

Total	\$316.11
Credit/ Debit	\$0.00
A VIOLOZIONIA PLINCARA	\$316.11

00928516

QUESTIONS? CALL YOUR PERSONAL ENDOWMENT REPRESENTATIVE TOLL FREE: 1-800-621-8981

Please see reverse side for important dividend information.

Doc 11642-3 Filed 10/26/16 Entered 10/26/16 15:41:45 Page 22 of 13-53846-tit

BILLING STATEMENT

For customer service, please call Toyota Financial Services at (800) 874-8822, or visit us online at www.toyotafinancial.com.

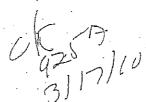
Statement Date Account Number	.3/12/201 030 608771	
SUMMARY OF CHARGES	, .	
Past Due Payment Amount	\$0.00	
Unpaid Late Charges	\$0.00	
Miscellaneous Charges	\$0.00	
Current Payment Due	\$628,10	
Total Amount Due	\$628.10	
Payment Due Date	. 3/29/2010	

ACCOUNT INFORMATION

Regular Payment Amount	\$628.10
Last Transaction Amount	\$628.10
Date of Last Transaction	2/24/2010
Monthly Payments Made	44
Maturity Date	6/29/2010
Outstanding Balance*	\$2,424.50

*Outstanding Balance is not your payoff amount. To obtain your payoff amount and poyoff instructions, please visit us online at www.toyotafinancial.com or contact Toyota Financial Services at (800) 874-8822.

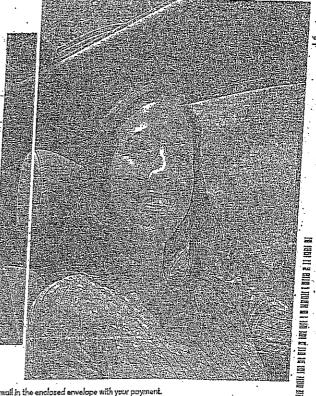
Please refer to the back of this statement for important information on negative credit reporting, check processing and the specially designated address when sending any communication regarding disputed payoffs.





Thank you for the opportunity to serve your financing needs.

You are near the end of your finance contract with Toyota Financial Services. We hope your experience with us has been satisfying. When shopping for your next Toyota, ask your dealer, about return customer benefits for TFS customers.



IMPORTANT: To ensure timely delivery, please detach this partian and mail in the enclosed envelope with your payment. Make check or maney order payable to Toyota Financial Services. Include your account number and name on the front of your check or money order.



BILLING STATEMENT

For customer service, please call Toyota Financial Services at (800) 874-8822, or visit us online at www.toyotafinancial.com.

Statement Data Account Number	9/11/2009 030 6087710
SUMMARY OF CHARGES	
Past Due Payment Amount	\$0.00
Unpaid Late Charges	\$0.00
Miscellaneous Charges	\$0.00
Current Payment Due	\$628.10
Total Amount Due	\$628.10
Payment Due Date	9/29/2009
	*

- Regular Payment Amount		. \$628.10
Last Transaction Amount		\$628.10
Date of Last Transaction	• •	8/22/2009
Monthly Payments Made	•	38
Maturity Date	•	6/29/2010
Outstanding Balance*	**	\$6,015.47

*Outstanding Balance is not your payoff amount. To obtain your . payoff amount and payoff instructions, please visit us online at www.toyotafinancial.com or contact Toyota Financial Services ot (800) 874-8822.

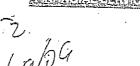
Please refer to the back of this statement for important information on negative credit reporting, check processing and the specially designated address when sending any communication regarding disputed payoffs.



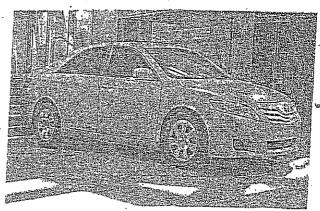
C/ 8952 C/ 9/19/09

Commonly chosen.

Uncommonly engineered.



32 MPG Highway Est.



Hybrid models available.

Vehicle shown with options 2009 EPA-estimates. 4 cylinder models. Actual mileage will vary.

VISIT YOUR LOCAL TOYOTA DEALER FOR A TEST DRIVE.

buyatoyota.com



IMPORTANTS To ensure timely delivery, please detach this portion and mail in the enclosed envelope with your payment. Make check or money order payable to Toyata Financial Services. Include your account number and name on the front of your check or money order.



•	PATIENT NAME	CPI NO.	STMT BATE	PAGE UNIV	ERSITY OF MICHIGAN HOSF E MEDICAL CENTER DRIVE	ITALS & HEALTH CENTERS
S	EIFMAN: MARCIA S	0408847	03/11/11		ARBOR MI,48109-0060	
≻— VISI	T DESCRIPTION	BEGIN-DATE EN	D-DATE CHG	/PMT/ADJ	INS PENDING	PATIENT AMT
	HOSPITAL	MONTHLY STATEMENT	OF ACTIVITY			
1049	OUTPT HOSP SERVICES OF THE FOLLOWING THE FOLLOWING	LOWING INSURANCE((S)		4552.30	0.00
	BLUE PREFERRED	02/18/11 - 02 VISIT TO		:	4552.30	0.00
1367	02/15/11 BLUE CROSS MI	SC INS PAYMENT		8353.20-	14068.65	0.00
	BLUE PREFERRED 02/15/11 BLUE CROSS CO BLUE PREFERRED	SERVICE ON 01, VTR INS ADJ SERVICE ON 01, VISIT TO	/29/11	5420.49-	0.00	294.96
		,			·	
				· / k	598.79	
					3/10/1	

FOR QUESTIONS REGARDING YOUR BALANCE CALL 800-992-9475 M-F, FROM 8:30AM-4:15PM; OR 888-843-8037 M-F, FROM 4:15PM-8PM, AND 9:00AM-6PM ON SATURDAY.

PLEASE PAY BALANCE IN FULL TO UPON RECEIPT OF THIS STATEMENT

NEW CHARGES/ADJMTS
PATIENT PYMTS/ADJMTS
INSURANCE PYMTS/ADJMTS 0.00 523.01 BALANCE THIS STATEMENT INSURANCE PENDING 7457.68 7077:30

200804 REV.4/03

PLEASE PAY THIS AMOUNT

5193 3 3

380.38



IMPURIANT CLEASE DETAUTION OF THE IL	CPI NO.	STMT. DATE	PACE	UNIVERSITY OF MICHIGAN HO	SPITALS & HEALTH CENT
PATIENT NAME		02/11/11	01	1500 E MÉDICAL CENTER DRIV ANN ARBOR MI 48109-0060	
SEIFMAN, MARCIA 5	0408847	, UZ/II/II	<u> </u>		
/ISIT DESCRIPTION BE	GIN-DATE EN	D-DATE CHG/	PMT/ADI	INS PENDING	PATIENT
	ONTHLY STATEMEN	T OF ACTIVITY			- 1
ייים עסכף כרמעדכרכ ומ		/28/10		76398,86	0.00
01/18/11 BLUE CROSS MIS	C INS PAYMENT. SERVICE ON 12	1	9792.17	-	
BLUE PREFERRED 01/18/11 BLUE CROSS CON	TR INS ADJ	5.	6606.69	-	
BLUE PREFERRED 01/25/11 BLUE CROSS MIS	SERVICE ON 12 C INS PAYMENT		0.00		•
BLUE PREFERRED. 01/25/11 BLUE CROSS LATE	SERVICE ON 12	/15/10	129.00-		
RILLE PREFERRED	. SEKVICE ON IZ	/ 15 / 10	129:00		
NEW CHARGES SINCE LAST S	VISIT TO		129.00	0,00	0.00
O.5 OUTPT HOSP SERVICES 01/	'07/11	•		3803.60	0.00
n2/01/11 BLUE CROSS MISC	INS PAYMENT SERVICE ON 01,		408.70-		
BLUE PREFERRED 02/01/11 BLUE CROSS CONT	R INS ADJ	2)42.73 -		
BLUE PREFERRED	SERVICE ON 01/ VISIT TOT	YT .01/ TT		0:00	352.17
- OUTPT HOSD SERVICES 01/	11/11	•		909.00	0.00
_02/08/11 BLUE CROSS MISC	INS PAYMENT:		841.68-	ta e e e e e e e e e e e e e e e e e e e	- ere a 1 Dari A rab a
BLUE PREFERRED 02/08/11 BLUE CROSS CONTI	SERVICE ON 01/ R INS ADJ	4	81.90-		
BLUE PREFERRED	SERVICE ON 01/ VISIT TOT		;	0.00.	85.42
HOED CERVICES 01/1	3 /17			909.00	0.00
02/08/11 BLUE CROSS MISC	.3/11 INS PAYMENT		41.68-		
BLUE PREFERRED 02/08/11 BLUE CROSS CONTR	SERVICE ON 01/3 INS ADJ	. 4	81.90-		
BLUE PREFERRED	SERVICE ON 01/1 VISIT TOTA			. 0.00	85.42
	720211	· · · · · · · · · · · · · · · · · · ·			- July 1
and the second second					(1)
				$(\cdot, 0)$	
		1.		\bigvee) [(1) [-1]
				f 1	(U) -
	•			Ua	1.
				O	3 3 3 4 4 9
	: :			•	
REV 603 FEDERAL TAX I.D. 3		OFF DEVEROE O	DE EQO II	MPORTANT INFORMATION	10.1

FOR QUESTIONS REGARDING YOUR BALANCE CALL 800-992 M-F, FROM 8:30AM-4:15PM; OR 888-843-8037 M-F, FROM 4:15PM-8PM, AND 9:00AM-6PM ON SATURDAY. P FASE PAY BALANCE IN FULL U PON RECEIPT OF THIS STATEMENT

BALANCE LAST STATEMENT 96869 118
NEW CHARGES/ADJMTS 258 009
PATIENT PYMFS/ADJMTS 0.00
INSURANCE PYMTS/ADJMTS 81626 45

BALANCE THIS STATEMENT 15500 66
INSURANCE PENDING 14977 65
PLEASE PAY THIS AMOUNT 5523 018
Eintered 10/26/16 15 41 45 Page 26 of

13-53846-tjt Doc 11642-3 Filed 10/26/16

	DATE.	PATIENT	DESCRIPTION	ACCOUNT	ACTIVITY
]	become from	INSURÂNCE	PATIENT
Ė	08/03/10	MARIA	PREVIOUS BALANCE	Tart I was	0.00
-	08/05/10	MARIA	TRANSFER INS BALANCE TO PATIENT		40.00
i i	ingst Language Parkagan		02/19/2010 99202 OFF VISIT, I - \$40.00 Co-payr	nent .	
- (58/05/10		TRANSFER INS BALANCE TO PATIENT		40.00
ļ	- 41 - 41	%	02/26/2010 99212 OFF VISIT, S - \$40.00 Co-pays	ent (
E	0.9/23/10	MARIA	TRANSFER INS BALANCE TO PATIENT	·	.40.00
		ger .	03/26/2010 99213 OFF VISIT, S - \$40.00 Co-paym	ent 8	
10	0/20/10	MARIA '	FRANSFER INS BALANCE TO PATIENT		40.00
		,	05/05/2010 99212 OFF VISIT, S - \$40.00 Co-paym	ènt	
1					

BALANCE

0-30 DAYS	31-60 DAYS	61-90 DAYS	91-120 DAYS	120+ DAYS
40.00	40.00	80.00	0.00	0.00

MAKE CHECKS PAYABLE TO:

ARNOLD S. GROSS, DPM, P.C.

PATIENT NAME	CP:	I 'NO.	· STMT D	ATE 1	PAGE	UNIVERSITY OF MICHIGAN HOSPITALS & HEALTH CENTER
SEIFMAN, MARCIA S	04088	47 1	02/11/11	-		1500 E MEDICAL CENTER DRIVE ANN ARBOR MI 48109-0060
IT DESCRIPTION	BEGIN-D	ATE . EN	D-DATE.		PMT/ADJ	INS PENDING PATIENT AMT
ЮН	SPITAL MONTHLY	STATEMEN	T OF ACTIV	ETY		and the second second
37 INPT HOSP SERVIC 01/18/11 BLUE CR BLUE PREFERRED 01/18/11 BLUE CR BLUE PREFERRED 01/25/11 BLUE CR BLUE PREFERRED 01/25/11 BLUE CR BLUE PREFERRED NEW CHARGES SINCE	OSS MISC INS. SER OSS CONTR INS. SER OSS MISC INS. SER OSS LATE CHG SER\ LAST STATEME	PAYMENT VICE ON 12 VICE ON 12 PAYMENT /ICE ON 12 INS ADJUST TICE ON 12	/15/10 /15/10 /15/10 /15/10	56	792.17 606.69- 0.00 129.00-	
)5 OUTPT HOSP SERVIC O2/01/11 BLUE CRO BLUE PREFERRED O2/01/11 BLUE CROS BLUE PREFERRED	ES 01/07/11 SS MISC INS P SERV SS CONTR INS A SERV	AYMENT ICE JON: 01/	07/11 07/11		08.70- 42.73-	0.00 0.00 3803.60 0.00 0.00 352.17
L1 OUTPT HOSP SERVICE02/08/11 BLUE CROS BLUE PREFERRED 02/08/11 BLUE CROS BLUE PREFERRED	S MISC INS PA SERVI S CONTR INS A SERVI	CE: ON 01/1	1/11	٠.	1.63- 1.90-	0.00 85.42
OUTPT HOSP SERVICES 02/08/11 BLUE CROSS BLUE PREFERRED 02/08/11 BLUE CROSS BLUE PREFERRED	S MISC INS PAY -SERVIC CONTR INS AL SERVIC	MENT E ON 01/13	3/11		1.68- 1.90-	909.00 0.00
EV. 4/03 FEDERAL T.	AX I.D. 386006309V	J	SEE DEVERO		- FOR # 1	PORTANT INFORMATION

PR QUESTIONS REGARDING YOUR BALANCE CALL 800-992 F, FROM 8:30AM-4:15PM; OR 888-843-8037 M-F, OM 4:15PM-8PM, AND 9:00AM-6PM ON SATURDAY.

EASE PAY BALANCE IN FULL ON RECEIPT OF THIS STATEMENT

NEW CHARGES/ADJMTS
PATIENT PYMTS/ADJMTS
INSURANCE PYMTS/ADJMTS

BALANCE THIS STATEMENT 0.15500 INSURANCE PENDING 14977 PLEASE PAY THIS AMOUNT 5773

13-53846-tit Doc 11642-3 Filed 10/26/16 Entered 10/26/16 15:41:45 Page 28 of

EXHIBIT 15

MINUTES OF MEETING OF SHAREHOLDERS AND DIRECTORS OF BARRY A. SEIFMAN, P.C. AKA SEIFMAN & GUZALL, P.C. HELD JANUARY 25, 2008

This matter having come before the Board, historically a one-man corporation, and it being recognized that the Minutes have been taking place orally for many years, but having gotten behind in memorializing them in writing.

Upon motion duly made, waiver of any and all notices that occur for the meeting was ratified.

Upon motion duly made, seconded and carried, all actions taken by Barry A. Seifman historically prior to date are ratified, and he shall be indemnified for any and all acts taken by him where it appears he was performing such acts in his judgment for the betterment of the Corporation.

It was further discussed that there was a stockholder transaction that took place. Such stockholder agreement allows for Raymond Guzall III to be a member of the Corporation, in recognition of his history of good faith service to the Corporation. Such shareholder agreement is hereby duly moved, seconded, ratified and incorporated herein as an attachment, and to be effective August 1, 2006.

It was further seconded and carried that the Board of Directors shall continue to be Barry A. Seifman.

It was further moved, seconded and carried that the officers of the Corporation shall be the various roles of Barry A. Seifman filling where necessary the roles of President, Vice President, Treasurer and Secretary and Marcia Seifman serving as Assistant Secretary in the event of emergencies.

It was further moved, seconded and carried, that Barry A. Seifman shall continue to make all economic decisions for the Corporation, including salaries, and shall keep Raymond Guzall III informed.

It was further, moved, seconded and carried that Barry A. Seifman shall use his discretion in opening up new bank accounts for the continued Corporation in its new d/b/a of Seifman & Guzall, P.C., to sign appropriate

bank documents as he deems the signatory should be.

There being no further business to come before the Board of Directors and Shareholders, the meeting was adjourned.

Date: January 25, 2008

Bary A. Seifman, Director

Barry A. Seifman Shareholder

Raymond Guzall III, Shareholder

EXHIBIT 16

2010 PROFIT Sharing National Brand 45-513 Eya-Ease Prepared By Boom 45-213 2 - Pack Approved By WEIGHTED dos Joras TOTALS 2010 2010 WAGES SEIFMAN GREE 2450000 5 7 8 8, Ģ 10 11 Spouse Receives 100% 12 13 14 2010 15 16/2 17 18 . 19 10-16-10 TO 10-11-11 A DODON TOTRUGO 20 21 , 22 23 772-88280 . 24 25 26 27 16. 2010 QUELED . 28 * 29 30 31 _ 32 33 34 35 36 Page 33 of Doc 11642-3 13-53846-tjt 10/26/16 ⊓tered 37

38

MONROE AND ASSOCIATES, INC.

Actuarial and Employee Benefit Plan Consultants

25901 West ien Mile Road, Suite 200 Southfield, Michigan 48033-2857 (248) 354-6220 Fax (248) 354-6287.

February 18, 2011

Mr. Barry Seifman 30665 Northwestern Hwy. Suite 255 Farmington Hills, MI 48334.

Re: Profit Sharing Plan Allocations For 2010

Dear Mr. Seifman:

The following allocations pass the general test and related gateway under IRC 401(a)(4) and is fully deductible under IRC 404. Other allocations are possible. This one maximizes you and your wife and minimizes all others.

Allocations are as follows:

ns are as lur	TOWD.		
	<u>Age</u>	Compensation	Allocation 1
B. Seifman M. Seifman R. Guzall A. McInally S. Smith	64 63 42 58 26	\$245,000 20,000 123,000 42,001 15,313	\$45.00 20,000 6,150 2,100

Please call if you have any questions.

sincerely,

Joel K. Letvin, E.A., M.A.A.A.

JKL/lam

John Selesko

Page 2 + any Employees during the plan year not covered by the plan: Date of Date Spouse Date sex Birth of Hire of Birth Compensation * Hrs if <1000 Name Marcia Seifmer F 7/3/1949 1-1-09 10-14-46 Employees who terminated retired, died, or became disabled during plan year: Date of Date Spouse Date Terminatic Birth of Hire of Birth Compensation # Hrs if <1000 Name 8-11-08 11-20.62 1-30-01 NA Also indicate any changin address, attorney, or accountant: * Show compensation as punt includable in IRS Form W-2 box (1) paid in the Plan Year. After Completion Pleaseturn to: Judith Murray Monroe & Associates, Inc. 25901 West Ten Mile Road, Suite 200 Southfield, Michigan 48033 (248) 354-6220 · · · Completed by (please stand date) one Number

13-53846-tit Doc 11642-3 Filed 10/26/16 Entered 10/26/16 15:41:45 Page 35 of

2017. Sm 49.t

Mari 17253,44 7863, Susan Fruith 6856.

Ray, 200, 200, 26,200,

Ambra 42012.06 2101.

9000

profit shows function of the state of the st Hat vin

TO: MARCIA SEIFMAN

Beginning Balance on 01-01-09		\$	0.00
	a de la companya de		1000.00
Contributions for 2009	٠.		0.00
Plan earnings for 2009			0.00
Balance as of 12-31-09		S	1000.00
Non-Forfeitable Percentage		•	0%
Vested Amount		· . \$	0.00

In the event of your death, your beneficiary would receive the total accrued benefit at the time of your death without any forfeiture due to vesting.

EXHIBIT 17

		=	
	1		
	-1	5	
	1		
	į	ž	
	þ	-	١
	2	Ξ	
	É		
	T.	7	
	-		
	۳		
(۱	7	
1	4	ø	
Ĺ			

	ALLOCATIONS.	posit # 10	Net Pay	10j0G Net Pay 1,352 80 Readychex # 1,0064[tilder] Check Amt 1,75	Net Pay . 417 7.5 Direct Deposit # 10214 Check Ant 0 00 Chkg 5846 669 03	Net Pay 669 03 Direct Deposit # 10215 Check Amt 0000 Chkg 9272 761775	Net Pay 76175 Readychex# 500649 Check Aint 7,34360	18 00 Check Amt 7,761 35 Dir Dep 5,669 70	18j0d Net Pay 13,431 13
JOURNAL	DEDUCTIONS	25 39 002 448	Medical		28 245 24	38:22 13:19 57:25 39:59	225 000 50 40 50 40	Medical	ALI MANAGEMENT AND
PAYROLL	WITHOLDINGS	×	×	Social Security 20116 Medicare Fed Income Tax 1425 Mi Income Tax 20,88	0.00	Social Security 38 Medicare 13 Fed Income Tax 57 MI Income Tax 39	Social Security 148:20 Medicare 155:00 Feu Income Tax 2,556:40 MI Income Tax 47:356	Societ Security 794 13 Fed Income Tax 3,602 72 805,66	0/16/12 - 0//31/12
CHARGE THE THE THE THE THE THE THE THE THE TH	ROTHER PAYMENTS INNINGS REPAYMENTS	3,958,34 3,858,34 1,856,45	1,856,46	000000000000000000000000000000000000000	721 00 721 00 910 00	910:00	11,000,00	18,925,79	Period Start - End Date 01/1(Check Date 01/13
Hours, Earnings penanti	NATE HOURS SEATIN	OTAL	TOTAL	TOTAL	TOTAL : 51 50 55 00	TOTAL 65 00	TOTAL	116,5C	
'650 Berry A Selfman P C WANIE HOURS, EARININGS	DESCRIPTION	Regular EMPLOYEE TOTAL Regular	EMPLOYEE	EMPLOYEE TOTAL	Kegular EMPLOYEE	EMPLOYEE TOTAL	EMPLOYEE	Regular COMPANY TOTAL YA Seliman P.C.	
ENGO C. 'SEC BUTYA	53846-ti	Guzall III, Raymond 2 O C C C C C C C C C C C C C C C C C C	Sellman, Marcia	ed 10/2#	16 Manuchael, Ann M	ered 10/2	26/16 150 20/116 150 20/116 16/16	6. Trensaction(s) 1. C	40 of

EXHIBIT 18

UNPUBLISHED OPINION. CHECK COURT RULES BEFORE CITING.

UNPUBLISHED
. Court of Appeals of Michigan.

Georgeanna BARTH and Paul Broschay, Plaintiffs-Appellants,

Geoffrey N. FIEGER, Defendant–Appellee. and Northlander Corp., Defendant.

Docket No. 306078. Jan. 22, 2013.

Oakland Circuit Court; LC No. 10-108864-NO.

Before: STEPHENS, P.J., and OWENS and MURRAY, JJ.

Opinion

PER CURIAM.

*1 in this attorney fee lien case, plaintiffs appeal the trial court's award of 90% of the disputed attorney fees to defendant Geoffrey Fieger and 10% to plaintiff Paul Broschay. We reverse and remand.

In February 2010, plaintiff Georgeana Barth was a resident of a hotel owned by defendant Northlander Corporation. There, she was subjected to a brutal sexual assault by an individual who gained access to her room with the help of his friend who worked at the front desk. In March 2010, Barth retained the Fieger firm to represent her claims against Northlander. During the time that plaintiff was represented by the Fieger firm, her case was handled exclusively by defendant Broschay. While employed with the Fieger firm, Broschay claims to have spent approximately 50 hours of time working on plaintiff's file. In May 2011, Broschay left the Fieger firm. Barth discharged the Fieger firm and retained Broschay independently to continue representing her on a contingency fee basis. Plaintiffs claim that Fieger began a "campaign of harassment" of Barth, demanding money and misrepresenting the degree of his personal involvement in her case.

In July 2011, on the eve of trial, Broschay successfully obtained a settlement on Barth's behalf in the underlying lawsuit against Northlander. The trial court entered an order dismissing the matter pursuant to the parties' settlement agreement. Broschay claims to have spent approximately 50 hours of time on Barth's case after the discharge of the Fieger firm. After costs, the attorney fee in this matter was approximately \$221,000.

On August 11, 2011, Fieger, as lienholder, filed a motion requesting an award of attorney fees. Fieger asserted that the Fieger firm "substantially performed the entire contingency undertaken in the retention agreement, and on a quantum meruit percentage basis is entitled to an award of a substantial portion (if not all) of the \$221,415.82 fee." After hearing arguments, the trial court awarded the Fieger law firm 90% and Broschay 10% of the \$221,000 attorney fee. The trial court entered an order consistent with its ruling, and Broschay timely filed this appeal.

We review the decision whether to enforce a lien such as this for an abuse of discretion, Reynolds v. Polen, 222 Mich.App 20, 24, 27; 564 NW2d 467 (1997). Plaintiffs first argue that the trial court abused its discretion in failing to consider whether Fieger's alleged misconduct resulted in a forfeiture of the Fieger firm's lien interest. We agree. The trial court failed to address this issue. When counsel brought up the issue at the hearing, the trial court stated, "I'm not going to hold an evidentiary hearing on this."

"[T]he law creates a lien of an attorney upon the judgment or fund resulting from his services." Ambrose v. Detroit Edison Co, 65 Mich.App 484, 487–488; 237 NW2d 520 (1975). If an attorney's employment is prematurely terminated before completing services contracted for

under a contingency fee agreement, the contingency fee agreement no longer operates to determine the attorney's fee and the attorney is entitled to compensation for the reasonable value of his services on the basis of quantum meruit, provided that his discharge was wrongful or his withdrawal was for good cause. Reynolds, 222 Mich.App at 27; see also Plunkett & Cooney, PC v. Capitol Bancorp Ltd, 212 Mich.App 325, 329-30; 536 NW2d 886 (1995); Morris v. Detroit, 189 Mich.App 271, 278; 472 NW2d 43 (1991); Ecclestone. Moffett & Humphrey, PC v. Ogne, Jinks, Alberts & Stuart, PC, 177 Mich.App 74, 76; 441 NW2d 7 (1989); Ambrose, 65 Mich.App at 488-492. "[A]s long as a discharged attorney does not engage in disciplinable misconduct prejudicial to the client's case or conduct contrary to public policy that would disqualify any quantum meruit award, a trial court should take into consideration the nature of the services rendered by an attorney before his discharge and award attorney fees on a quantum meruit basis." Reynolds, 222 Mich.App at 27. However, "quantum meruit recovery of attorney fees is barred when an attorney engages in misconduct that results in representation that falls below the standard required of an attorney (e.g., disciplinable misconduct under the Michigan Rules of Professional Conduct) or when such recovery would otherwise be contrary to public policy." Id. at 26.

*2 In their responsive pleadings 1, plaintiffs alleged that Fieger engaged in interference with a known contractual relationship, in direct solicitation, and in misconduct. Additionally, plaintiffs contend that Fieger engaged in ex-parte communication with the client of another attorney (violations of MRPC 4.2 and 7.3(b)(1)-(2)). We conclude that the trial court erred in falling to consider these allegations, which, if proven, could result in a forfeiture of any right to Fieger's lien. On remand, the trial court is instructed to hold a hearing on the issue of whether Fieger's behavior constituted misconduct.

Next, plaintiffs contend that the trial court erred by failing to apply quantum meruit, and by refusing to consider plaintiffs' pleadings, affidavits, and other record evidence in calculating the division of the attorney fee. We agree.

If the trial court concludes that Fieger committed unethical and professional misconduct that resulted in a forfeiture of his firm's lien interest, then the trial court need not engage in a quantum meruit analysis. However, if the trial court does not conclude that Fieger's conduct rose to the level of unethical and professional misconduct, then the court must consider the pleadings, affidavits, and other record evidence in order to apply quantum meruit to the division of the attorney fees.

The phrase "quantum meruit" means " 'as much as deserved.' " Keywell & Rosenfeld v. Bithell, 254 Mich.App 300, 359; 657 NW2d 759 (2002) (quoting Black's Law Dictionary (6th ed, 1990), p. 1243). It is "an equitable principle that measures recovery under an implied contract to pay compensation as reasonable value of services rendered." Id. at 358 (quotation marks omitted). Black's Law Dictionary defines "quantum meruit" as follows:

[Latin "as much as he has deserved"] (17c) 1. The reasonable value of services; damages awarded in an amount considered reasonable to compensate a person who has rendered services in a quasi-contractual relationship. 2. A claim or right of action for the reasonable value of services rendered. 3. At common law, a count in an assumpsit action to recover payment for services rendered to another person. Quantum meruit is still used today as an equitable remedy to provide restitution for unjust enrichment. It is often pleaded as an alternative claim in a breach-of-contract case so that the plaintiff can recover even if the contract is unenforceable.... [BLACK'S LAW DICTIONARY (6th ed 1990).]

The method by which quantum meruit recovery of attorney fees is determined in Michigan where there exists a contingency fee agreement and the attorney was wrongfully discharged² or rightfully withdrew was outlined in *Morris*, 189 Mich.App at 278–279:

We recognize that there is no precise formula for assessing the reasonableness of an attorney's fee. Nevertheless, in *Crawley v. Schick*, 48 Mich.App 728, 737; 211 NW2d 217 (1973), this Court enumerated several nonexclusive factors appropriately considered for such a determination, including:

*3 (1) the professional standing and experience of the attorney; (2) the skill, time and labor involved; (3) the amount in question and the results achieved; (4) the difficulty of the case; (5) the expenses incurred; and (6) the nature and length of the professional relationship with the client.

While the trial court should consider these factors, its decision need not be limited to these guidelines. Wood v. DAIIE, 413 Mich. 573, 588; 321 NW2d 653 (1982)[, mod by Smith v.

13-53846-tjt Khouri, 481 Mich. 519, 522; 751 NW2d 472 (2008)]; Smolen v. Dahlmann Apartments,
Ltd, 186 Mich. App 292, 396; 453 100 da 100 (260) 1.6 beli **5 Nta Radia 2012 6/** 16 15:41:45 Page 43 of

Daim A. TIARA

also properly consider that the attorney originally agreed to render services on a contingency basis. Such a consideration would allow the court to consider the degree of risk undertaken by an attorney who was prematurely discharged. Accordingly, it would be appropriate for the court to award the attorney a larger fee, provided that the fee was not in excess of that permitted under MCR 8.121.

A trial court may also consider the factors listed in MRPC 1.5(a), which overlap the Crawley factors. Smith, 481 Mich. at 529. In Reynolds, 222 Mich.App at 30, this Court added:

We believe that a trial court is in the best position to assess an attorney's contribution to a case because trial courts are aware of the strengths and weaknesses of cases before them, the time and effort expended by the attorneys, and changes in the parties' leverage resulting from changes in counsel (e.g., due to attorneys' skill or reputation). We believe that the Morris approach to quantum meruit-one compensates an attorney for completed work on the basis of evaluating as closely as possible the actual deal struck between the client and the attorney rather than an assessment of reasonable compensation in the abstract-is also the proper means of evaluating quantum meruit in cases such as the instant one.

Similarly, Michigan Courts have identified the following nonexhaustive list of factors to be considered in determining the reasonable value of fees on the basis of quantum meruit, which are virtually identical to those referenced in Paolillo:

(1) the professional standing and experience of the attorney; (2) the skill, time and labor involved; (3) the amount in question and the results achieved; (4) the difficulty of the case; (5) the expenses incurred; and (6) the nature and length of the professional relationship with the client. [Morris v. City of Detroit, 189 Mich.App 271, 279, 472 NW2d 43 (1991) (citing Crawley v. Schick, 48 Mich.App 728, 737; 211 NW2d 217 (1973)).]

in reviewing the transcript of the hearing, it is clear that the trial court could not have performed a proper assessment of the quantum meruit in this case when it acknowledged that it had not even read plaintiffs' responsive pleadings. It is unclear from the record exactly how the trial court arrived at its 90/10 award. The court ignored the evidence presented, eschewing plaintiffs' responsive pleadings, and instead relied on its own personal experience:

*4 Okay. You know, I've done, not Plaintiff's work, but I've done this kind of work and I would imagine it's even more so on the Plaintiff's part. The lion's share of the work is done at the beginning of the file. All the research, all the pleadings, you know, I would think that takes the most in any kind of file really.

This was not a proper analysis, given the availability of actual documentation about the amount of time Broschay spent on this case before and after leaving the Fieger firm. Therefore, should a quantum meruit analysis be necessary, we instruct the trial court to review the documentary evidence provided by the parties and to reach a conclusion based on this evidence.

We reverse and remand for proceedings consistent with this opinion. We do not retain jurisdiction.

Footnotes

We note that Fieger contends that Broschay failed to file any responsive pleadings with the trial court. The record shows that Broschay did file a timely response on August 19, 2011.

Or the attorney was discharged with some justification, just not enough to be 2 wrongful.

End of Document

© 2013 Thomson Reuters. No claim to original U.S. Government Works.

My Contacts Offers

Getting Started

Help : Live Chat : Sign Off

WestlawNext. © 2013 Thomson Reuters - Privacy Stalament | Accessibility | Contact Us | 1-800-REF-ATTY (1-800-733-2889) | Improve WestlawNext

